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10 *Attorneys for Debtor*
11 Northern Holding, LLC

12 **UNITED STATES BANKRUPTCY COURT**
13 **CENTRAL DISTRICT OF CALIFORNIA**
14 **SANTA ANA DIVISION**

15 In re

16 NORTHERN HOLDING, LLC,

17 Debtor.

18 Case No. 8:20-bk-13014-MW

19 Chapter 7 (formerly 11)

20 **FINAL APPLICATION BY RESNIK**
21 **HAYES MORADI LLP, GENERAL**
22 **BANKRUPTCY COUNSEL FOR THE**
23 **DEBTOR, FOR ALLOWANCE OF**
24 **FEES AND REIMBURSEMENT OF**
25 **COSTS FOR THE PERIOD**
26 **FEBRUARY 5, 2021 THROUGH JUNE**
27 **15, 2021; DECLARATIONS OF**
28 **LEROY CODDING AND ROKSANA D.**
MORADI-BROVIA IN SUPPORT
THEREOF

Date: November 22, 2021

Time: 9:00 a.m.

Place: Courtroom 6C

411 W. Fourth Street
Santa Ana, CA 92701

29 **TO THE HONORABLE MARK S. WALLACE, UNITED STATES**
30 **BANKRUPTCY JUDGE; THE CHAPTER 7 TRUSTEE AND HIS ATTORNEY OF**
31 **RECORD; AND ALL PARTIES IN INTEREST:**

32 PLEASE TAKE NOTICE that on November 22, 2021 at 9:00 a.m., or as soon
33 thereafter as the matter may be heard, Courtroom 6C at the U.S. Bankruptcy Court located

1 at 411 W. Fourth Street, Santa Ana, CA 92701, Resnik Hayes Moradi LLP (“Applicant” or
2 the “Firm”), general bankruptcy counsel for Northern Holding, LLC, the “Debtor” and the
3 former “Debtor-in-Possession” in the above-captioned case, initially filed under Chapter
4 11 and thereafter converted to Chapter 7, shall and does hereby, move the Court for an
5 order approving this *Final Application for Allowance of Fees and Reimbursement of Costs*
6 *for the Period February 5, 2021 through June 15, 2021*, as set forth herein.

7 The Application seeks allowance of fees for services rendered of \$33,285 by the
8 Firm for the period February 5, 2021 through June 15, 2021, approval of \$162.07 in costs
9 and expenses expended on behalf of the Debtor for the same period; and approval of the
10 previously approved interim fees of \$65,629.50 and expenses of \$1,983.18 on a *final* basis,
11 less the prepetition retainer paid of \$35,000.

12 The Application is based upon this Notice of Application and Application, the
13 attached declarations, all pleadings and records on file in this case, and upon such other
14 evidentiary matters as may be presented to the Court regarding the Application.

15 PLEASE TAKE FURTHER NOTICE that pursuant to Local Bankruptcy Rule
16 9013-1, any party opposing the relief sought by the Application must file a written
17 opposition setting forth the facts and law upon which the opposition is based and must
18 appear at the hearing on the Application. Any factual allegations set forth in such written
19 response must be supported by competent and admissible evidence.

20 Any response or opposition to the Application must be filed with the Court and
21 served on the Debtor’s counsel at least 14-days prior to the scheduled hearing date on the
22 Application (not excluding Saturdays, Sundays, or legal holidays). Such responses, if any,
23 must be served on the Debtors' Counsel at the address noted in upper left-hand corner of
24 the first page of this notice.

25 ///

26 ///

27 ///

Pursuant to Local Bankruptcy Rule 9013-1, any response not timely filed and served may be deemed by the Court to be consent to the granting of the relief requested by the Application.

Dated: September 29, 2021

RESNIK HAYES MORADI LLP

By: /s/ Roksana D. Moradi-Brovia

Roksana D. Moradi-Brovia

W. Sloan Youkstetter

Attorneys for Debtor

Northern Holding, LLC

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MEMORANDUM OF POINTS AND AUTHORITIES

RESNIK HAYES MORADI LLP (the “Firm” or “Applicant”), general bankruptcy counsel for the bankruptcy estate of Northern Holding, LLC, the “Debtor” herein and the former “Debtor-in-Possession,” hereby applies to the Court as follows:

I. INTRODUCTION

The Application seeks allowance of fees for services rendered of \$33,285 by the Firm for the period February 5, 2021 through June 15, 2021, approval of \$162.07 in costs and expenses expended on behalf of the Debtor for the same period; and approval of the previously approved interim fees of \$65,629.50 and expenses of \$1,983.18 on a *final* basis, less the prepetition retainer paid of \$35,000.

The case was converted to Chapter 7 on June 15, 2021 [Docket No. 116].

**II. BACKGROUND INFORMATION IN COMPLIANCE WITH LOCAL
BANKRUPTCY RULES**

1. Name and Location of Applicant: Applicant is RESNIK HAYES MORADI LLP and is located at 17609 Ventura Blvd., Suite 314, Encino, CA 91316.

2. Type of Service Rendered: Applicant is employed as general bankruptcy counsel for the Debtor.

3. Date Chapter 11 Case was Commenced: The Debtor commenced this bankruptcy case by filing for relief under Chapter 11 on October 28, 2020.

4. Date Employment Commenced and Date of Authorization: The Court entered an order on January 4, 2021 [Docket No. 40] authorizing the employment of Applicant as of October 28, 2020.

5. Date of Last Fee Application: Applicant filed its *First Interim Application for Allowance of Fees and Reimbursement of Costs* on February 26, 2021 [Docket No. 67].

1 The Court entered an order approving the fees on March 24, 2021 [Docket No. 96];
2 however, no payment was authorized at that time absent a determination as to the
3 extent to which Farm Credit West is over or under-secured.

4 6. Summary of Fees and Costs Previously Allowed and Paid.

- 5 a. Amount of Advanced Fee Payment Received: *\$35,000*.
6 b. Amount of Advanced Fee Payment Remaining: *None*.
7 c. Amount Actually Paid Pursuant to Prior Applications: *N/A, see*
8 *above* [Docket No. 96].
9 d. Total Amount Remaining to be Paid Pursuant to Prior
10 Applications: *fees of \$30,629.50 (\$65,629.50 less draw-down of*
11 *\$35,000 retainer) and expenses of \$1,983.18*
12 e. Total Amount Allowed Yet Reserved Pending Final Fee
13 Application: *N/A*.

14 7. Source of Fee Payment and Cost Reimbursement: Applicant anticipates
15 being paid its fees pursuant to the sale of the Debtor's real properties by the Chapter 7
16 Trustee.

17 8. Compliance with Local Bankruptcy Rule 2016-1(k): Applicant has reviewed
18 the requirements of Local Bankruptcy Rule 2016-1(k). This Application complies with
19 this rule.
20

21 **III. OVERVIEW OF THE CHAPTER 11 CASE**

22 The Debtor commenced its bankruptcy case by filing a voluntary petition under
23 Chapter 11 of 11 U.S.C. §101 et seq on October 28, 2020. The case was converted to
24 Chapter 7 on June 15, 2021 [Docket No. 116].

25 The Debtor is a Minnesota LLC; it was created for the purpose of acquiring and
26 restructuring a wine importer/distribution company in St. Paul, MN. Leroy Coddington is the
27 sole and managing member of the Debtor.
28

Prior conversion, the Debtor owned and operated the following real properties which it acquired from Erich Russell on October 27, 2020:

| | |
|--|--|
| <p>“Live Oak Property”</p> <p>2380 Live Oak Road Paso Robles, CA 93446</p> <p><i>2 homes on the property.</i></p> | <p>FMV \$9,700,000</p> <p>1st TD: Farm Credit West, FLCA [hereinafter “FCW”] (cross-collateralized with 1172 and Texas Road) \$19,040,509.25 (per Farm Credit’s Motion for Relief)</p> <p>Property Taxes: County of San Luis Obispo County Tax Collector \$13,625.84</p> |
| <p>“1172 Property”</p> <p>1172 San Marcos Road Paso Robles, CA 93446</p> <p><i>Winery facility (42,000 sq ft) and residential apartment.</i></p> | <p>FMV \$11,500,000</p> <p>1st TD: Farm Credit (cross-collateralized with Live Oak and Texas Road) \$19,040,509.25 (per FCW’s Motion for Relief)</p> <p>Property Taxes: County of San Luis Obispo County Tax Collector \$3,200,000</p> |
| <p>“Texas Road Property”</p> <p>APN 027-145-022</p> <p><i>42-acre vineyard (permits obtained for a single-family residence but no plan to proceed with construction at this point).</i></p> | <p>FMV \$4,300,000</p> <p>1st TD: FCW (cross-collateralized with 1172 and Live Oak) \$19,040,509.25 (per FCW’s Motion for Relief)</p> <p>Property Taxes: County of San Luis Obispo County Tax Collector \$6,618.26</p> |

1 The Debtor also owns equipment: various pumps and irrigation capital equipment;
2 trellis systems, miscellaneous winery equipment.

3 This case was filed in order to stop a foreclosure sale of the Debtor's real properties
4 by lienholder FCW and so that it can otherwise reorganize its financial affairs.

5
6 **IV. DESCRIPTION OF SERVICES BY CATEGORY**

7 The services rendered on behalf of the Debtor included the following:

8
9 **A. ASSET ANALYSIS AND VALUATION**

10 During this billing period, the Firm spent substantial time corresponding with the
11 Debtor's principal and the broker regarding the strategy and efforts to sell the real
12 properties.

13 As set forth in Exhibit "A" to the accompanying Declaration of Roksana D.
14 Moradi-Brovia, a total of 7.6 hours have been incurred in connection with this activity
15 code category, which when billed at Applicant's regular hourly rates, total fees of \$4,085.
16 The blended rate for this category is \$538.

17
18 **B. CASE ADMINISTRATION**

19 The Firm expended substantial time working with the Debtor with regard to its
20 continuing obligations to the UST including the Monthly Operating Reports ("MORs"),
21 and acted as an intermediary between the UST and Debtor. The Firm also corresponded
22 with Debtor about insurance renewals.

23 The Firm also spent significant time consulting with the Debtor regarding case
24 strategy, its obligations as a DIP and its intentions for reorganization.

25 The U.S. Trustee filed a *Motion by United States Trustee to Dismiss or Convert*
26 *Case Pursuant to 11 U.S.C. §1112(b)* on February 16, 2021 [Docket No. 60]; the Debtor
27 filed an *Opposition* on March 8, 2021 [Docket No. 81]; the U.S. Trustee filed a *Reply* on
28

1 March 15, 2021 [Docket No. 82]; the U.S. Trustee filed a *Supplemental* on May 13, 2021
2 [Docket No. 112]; the Court entered an order converting the case to Chapter 7 on June 15,
3 2021 [Docket No. 116].

4 As set forth in Exhibit "A," a total of 29.9 hours have been incurred in connection
5 with this activity code category, which when billed at Applicant's regular hourly rates, total
6 fees of \$13,870. The blended rate for this category is \$408.

7
8 **C. CASH COLLATERAL**

9 This billing entry was miscategorized as “cash collateral” rather than “case
10 administration.” The work performed was a review the MOR for tax implications.

11 As set forth in Exhibit "A," a total of 0.5 hours have been incurred in connection
12 with this activity code category, which when billed at Applicant's regular hourly rates, total
13 fees of \$275. The blended rate for this category is \$550.

14
15 **D. DISCLOSURE STATEMENT AND PLAN OF**
16 **REORGANIZATION**

17 During this billing period, the Firm continued to prosecute the Debtor’s *Motion for*
18 *Order Extending Debtor's Exclusivity Period to File a Chapter 11 Plan of Reorganization*
19 on January 18, 2021 [Docket No. 42], by reviewing the Court’s tentative ruling and
20 attending the hearing. As the Debtor sought to sell its properties, it was not ready to file a
21 disclosure statement and plan within the statutory time period to file a plan. The Court
22 entered an order granting the motion on February 12, 2021 [Docket No. 55].

23 As is set forth in Exhibit "A," a total of 2.5 hours have been incurred in connection
24 with this activity code category, which when billed at Applicant's regular hourly rates, total
25 fees of \$1,205. The blended rate for this category is \$482.

26

1
2 **E. EMPLOYMENT AND FEE APPLICATIONS**

3 During this billing period, the Firm spent a substantial time preparing the
4 application to employ the real estate broker, reviewing the opposition, and drafting the
5 reply to the opposition. The Debtor sought to sell the properties that would pay all secured
6 claims in full. The Firm also started to draft this interim fee application.

7 The Debtor filed its *Application to Employ Hilco Real Estate, LLC as Real Estate*
8 *Agent* on February 15, 2021 [Docket No. 57]; FCW filed an *Opposition* on February 26,
9 2021 [Docket No. 70]; the Debtor filed its *Reply* on March 8, 2021 [Docket No. 80]; the
10 Court entered an order approving the employment on March 24, 2021 [Docket No. 95].

11 The Debtor filed its *First Interim Fee Application by Resnik Hayes Moradi LLP*
12 (the "Interim Fee Application") [Docket No. 67]; FCW filed an *Opposition* on March 5,
13 2021 [Docket No. 78]; the Court entered an order approving the fees on March 24, 2021
14 [Docket No. 96].

15 As set forth in **Exhibit "A,"** a total of 17.9 hours have been incurred in connection
16 with this activity code category, which when billed at Applicant's regular hourly rates, total
17 fees of \$7,510. The blended rate for this category is \$420.

18
19 **F. GENERAL CREDITOR ISSUES AND MOTION FOR RELIEF**

20 During this billing period, the Firm spent a substantial time litigating with FCW
21 regarding its motion for relief, including discovery, and various other issues. The Firm
22 communicated with counsel for FCW regarding the issues pertaining to the continued
23 motion for relief. The Firm communicated with the appraiser regarding testifying at the
24 continued motion for relief hearing. The Firm reviewed proof of claims as they were filed.

25 Farm Credit propounded interrogatories from the Debtor which the Debtor
26 produced.

As set forth in Exhibit "A," a total of 13.1 hours have been incurred in connection with this activity code category, which when billed at Applicant's regular hourly rates, total fees of \$6,340. The blended rate for this category is \$484.

V. SUMMARY OF FEES

A summary showing the total amount billed by each timekeeper:

| Timekeeper | Initials | Rate | Hours | Amount |
|--|----------|-------|-------------|-----------------|
| David Kritzer (attorney) | DK | \$350 | 1.4 | \$490 |
| Matthew D. Resnik (attorney) | MDR | \$550 | 12.5 | \$6,875 |
| Roksana D. Moradi-Brovia (attorney) | RDM | \$500 | 38.4 | \$19,200 |
| W. Sloan Youkstetter (attorney) | WSY | \$350 | 19.2 | \$6,720 |
| TOTAL: | | | 71.5 | \$33,285 |

A summary showing the total amount billed by category:

| CATEGORY | HOURS | AMOUNT |
|--|-------------|-----------------|
| ASSET VALUATION | 7.6 | \$4,085 |
| CASE ADMINISTRATION | 29.9 | \$13,870 |
| CASH COLLATERAL (<i>miscategorized</i>) | 0.5 | \$275 |
| DISCLOSURE STATEMENT AND PLAN OF REORGANIZATION | 2.5 | \$1,205 |
| EMPLOYMENT AND FEE APPLICATIONS | 17.9 | \$7,510 |
| GENERAL CREDITOR ISSUES | 13.1 | \$6,340 |
| SECTION 341(a) MEETING OF CREDITORS | 2.8 | \$1,400 |
| Total: | 71.5 | \$33,285 |

1
2 **VI. EXPENSES**

3 The Firm requests reimbursement of costs and expenses of \$162.07 which consists
4 of the various mailing costs and Court Call; those costs are set forth in **Exhibit "C."**

5
6 **VII. DETAILED LISTINGS OF ALL TIME SPENT**

7 Detailed listings of all time spent, including the date that each service was rendered,
8 a description of the service, the amount of time spent, and the particular person who
9 rendered the service during this period, sorted by category, are set forth in **Exhibit "A."**

10 Detailed listings of all time spent, including the date that each service was rendered,
11 a description of the service, the amount of time spent, and the particular person who
12 rendered the service during this period, sorted by timekeeper, are set forth in **Exhibit "B."**

13 Applicant provides monthly invoices to Debtor during this case; however, the
14 attached invoice encompasses the entire time period for ease in drafting this Application,
15 and for ease in evaluation of all work performed.

16
17 **VIII. LISTING OF PROFESSIONAL EDUCATION AND EXPERIENCE**

18 The Firm resume listing the professional education and experience of the Firms'
19 staff is attached hereto as **Exhibit "D."**

20
21 WHEREFORE, Applicant respectfully requests:

22
23 1. That the Court, pursuant to 11 U.S.C. §330, approve fees for services
24 rendered of \$33,285 by the Firm from February 5, 2021 through June 15, 2021;

25 2. That the Court allow \$162.07 in costs and expenses expended on behalf of
26 the Debtor for that same period;

1 3. That the Court approve of the previously approved interim fees of
2 \$65,629.50 and expenses of \$1,983.18 on a *final* basis, less the prepetition retainer paid of
3 \$35,000; and

4 4. Such other and further relief as this Court deems just and proper.

5
6 Dated: September 29, 2021

RESNIK HAYES MORADI LLP

7
8 By: /s/ Roksana D. Moradi-Brovia

Roksana D. Moradi-Brovia
W. Sloan Youkstetter
Attorneys for Debtor
Northern Holding, LLC

DECLARATION OF ROKSANA D. MORADI-BROVIA

I, Roksana D. Moradi-Brovia, declare as follows:

1. I have personal knowledge of the facts set forth herein, and if called as a witness, I could and would testify competently with respect thereto. Where facts are alleged upon information and belief, I believe them to be true.

2. I am an attorney at law licensed in the State of California. I am admitted to practice in all the Courts of the State of California and am admitted to practice before the District Court of the Central District of California, and before this Court.

3. I am a partner at Resnik Hayes Moradi LLP (the "Firm"), the Applicant herein.

4. I am counsel of record for Northern Holdings, LLC, the "Debtor" and the former "Debtor-in-Possession" in the above-captioned case, initially filed under Chapter 11 and thereafter converted to Chapter 7.

5. It is the practice of the Firm to prepare books and records on a regular basis. The Firm keeps such books and records in the ordinary course of our business. We prepare such business records at or about the time of the events recorded in the business records.

6. Detailed listings of all the time spent in representing the Debtor from February 5, 2021 through June 15, 2021, including the date that each service was rendered, a description of the service, the amount of time spent, and the particular person who rendered the service are sorted by category and set forth in **Exhibit "A"** and incorporated herein by reference as though set forth in full.

7. Detailed listings of all the time spent in representing the Debtor from February 5, 2021 through June 15, 2021, including the date that each service was rendered, a description of the service, the amount of time spent, and the particular person who

1 rendered the service are sorted by timekeeper and set forth in **Exhibit "B"** and
2 incorporated herein by reference as though set forth in full.

3 8. Detailed listings of all costs and expenses incurred while representing the
4 Debtor from February 5, 2021 through June 15, 2021 are set forth in **Exhibit "C"** and
5 incorporated herein by reference as though set forth in full.

6 9. The Firm resume listing my professional education and experience and those
7 of the Firm is attached hereto as **Exhibit "D."**

8
9 I declare under penalty of perjury under the laws of the United States of America
10 that the foregoing is true and correct.

11
12 Executed on September 29, 2021, at Encino, California.

13
14 /s/ Roksana D. Moradi-Brovia
15 **Roksana D. Moradi-Brovia**
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DECLARATION OF LEROY CODDING

I, Leroy Coddington, declare as follows:

1. I am over the age of 18. I have personal knowledge of the facts set forth herein, and if called as a witness, I could and would testify competently with respect thereto. Where facts are alleged upon information and belief, I believe them to be true.

2. I am the sole and managing member of Northern Holdings, LLC, the "Debtor" and the former "Debtor-in-Possession" in the above-captioned case, initially filed under Chapter 11 and thereafter converted to Chapter 7. I am authorized to make decisions for the Debtor.

3. I have received and reviewed the billings of Resnik Hayes Moradi LLP (the "Firm").

4. I have reviewed the *Final Application for Allowance of Fees and Reimbursement of Costs for the Period February 5, 2021 through June 15, 2021* (the "Application"), for the Firm's representation of the Debtor in this Chapter 11 case.

5. I had email correspondence with Roksana D. Moradi-Brovia regarding the Application and do not have any objections to these charges for professional services and expenses.

6. The Firm should be paid pursuant to the sale of the properties by the Chapter 7 Trustee.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed this September 29, 2021, at Paso Robles, California.

By: 
Leroy Coddington
Declarant

EXHIBIT “A”

| Date | User | Description | Rate/ Unit Price | Labor Time/ Quantity | Billable Time/ Cost Price | Bill Amt/ Sell Price |
|---|--------------------------|---|---------------------|-------------------------|------------------------------|-------------------------|
| ASSET SALE, ANALYSIS AND VALUATION | | | | | | |
| 02/12/2021 | Matthew Resnik | tc with hilco re confirmation of changes and requirements under the ch 11 Bk and process confirmation | \$550.00 hr | 0.60 | 0.60 | \$330.00 |
| 02/26/2021 | Roksana D. Moradi-Brovia | Rev and rep to email from client re issue w appraiser provide supp to value | \$500.00 hr | 0.10 | 0.10 | \$50.00 |
| 03/03/2021 | Matthew Resnik | Tc with RDM over strategy movig forward with purchase and sale offers and the pending stalking horse developments | \$550.00 hr | 0.60 | 0.60 | \$330.00 |
| 03/03/2021 | Matthew Resnik | Tc with LC over strategy movig forward with purchase and sale offers and the pending stalking horse developments - requested the additional compliance to create a structure with deadlines as to how we will be moving forward w/possible other developments | \$550.00 hr | 0.60 | 0.60 | \$330.00 |
| 03/03/2021 | Matthew Resnik | Tc with RDM over strategy movig forward with purchase and sale offers and the pending stalking horse developments | \$550.00 hr | 0.60 | 0.60 | \$330.00 |
| 03/22/2021 | Matthew Resnik | corr with Hilco re the approval of the sale and finance | \$550.00 hr | 0.60 | 0.60 | \$330.00 |
| 04/13/2021 | Roksana D. Moradi-Brovia | Rev client email re status of sale efforts | \$500.00 hr | 0.10 | 0.10 | \$50.00 |
| 05/18/2021 | Roksana D. Moradi-Brovia | Rev email from pros buyer and email client re same then review response re plan of action | \$500.00 hr | 0.20 | 0.20 | \$100.00 |
| 06/04/2021 | Matthew Resnik | Tc with Hilco and DIP re status of case and any of the progress made | \$550.00 hr | 0.70 | 0.70 | \$385.00 |
| 06/04/2021 | Roksana D. Moradi-Brovia | TC w client and Hilco team re status (.6), then call w client re same (.1) | \$500.00 hr | 0.70 | 0.70 | \$350.00 |

| | | | | | | |
|------------|--------------------------|---|-------------|-------------|-------------|-------------------|
| 06/07/2021 | Roksana D. Moradi-Brovia | Rev 2 emails w all details on interest in the properties from client and broker | \$500.00 hr | 0.30 | 0.30 | \$150.00 |
| 06/11/2021 | Matthew Resnik | review various letter of intent from the broker Hilco re the stat conf and prep for meeting | \$550.00 hr | 0.70 | 0.70 | \$385.00 |
| 06/11/2021 | Matthew Resnik | TC with Hilco, RDM and LC managing member re status of sale and strategy moving forward | \$550.00 hr | 0.60 | 0.60 | \$330.00 |
| 06/11/2021 | Roksana D. Moradi-Brovia | TC client and Hilco team re all bids rec and status | \$500.00 hr | 0.50 | 0.50 | \$250.00 |
| 06/14/2021 | Matthew Resnik | tc related to issues in the hearing, MORS and valuation related to the ongoing ch 11 and just mxn to dx | \$550.00 hr | 0.70 | 0.70 | \$385.00 |
| | | | | 7.60 | 7.60 | \$4,085.00 |

Case Administration

| | | | | | | |
|------------|--------------------------|--|-------------|------|------|----------|
| 02/08/2021 | Roksana D. Moradi-Brovia | Draft st rpt and dec and email all to client for rev/comment | \$500.00 hr | 0.90 | 0.90 | \$450.00 |
| 02/09/2021 | Roksana D. Moradi-Brovia | Rev client email re draft 2nd st rpt and reply and then make the edits | \$500.00 hr | 0.30 | 0.30 | \$150.00 |
| 02/10/2021 | Roksana D. Moradi-Brovia | Rev email from client re add/l info for st rpt and then make the final edits | \$500.00 hr | 0.40 | 0.40 | \$200.00 |
| 02/15/2021 | Roksana D. Moradi-Brovia | Rev Jan MOR draft, send back comments to mor prep and client | \$500.00 hr | 0.30 | 0.30 | \$150.00 |
| 02/17/2021 | Roksana D. Moradi-Brovia | Rev and study UST mtn dism | \$500.00 hr | 0.50 | 0.50 | \$250.00 |
| 02/17/2021 | Roksana D. Moradi-Brovia | Rev and rep to email from client re ust mtn dism details | \$500.00 hr | 0.20 | 0.20 | \$100.00 |

| | | | | | | |
|------------|-----------------------------|--|-------------|------|------|----------|
| 02/18/2021 | Sloan Youkstetter | Review the UST's motion to dismiss. | \$350.00 hr | 0.30 | 0.30 | \$105.00 |
| 02/19/2021 | Roksana D. Moradi-Brovia | Review ust compliance, mors, insur, case status with RZ | \$500.00 hr | 0.40 | 0.40 | \$200.00 |
| 02/19/2021 | Sloan Youkstetter | Review the US Trustee's motion to dismiss. | \$350.00 hr | 0.40 | 0.40 | \$140.00 |
| 02/22/2021 | Roksana D. Moradi-Brovia | Rev lengthily email from client re info for opp ust mtn plus new PSA, then start outlining the opp to mtn dism | \$500.00 hr | 0.50 | 0.50 | \$250.00 |
| 02/23/2021 | Roksana D. Moradi-Brovia | Rev and rep to email from client re updates on the case for the st conf | \$500.00 hr | 0.20 | 0.20 | \$100.00 |
| 02/23/2021 | Roksana D. Moradi-Brovia | Prep for st conf | \$500.00 hr | 0.40 | 0.40 | \$200.00 |
| 02/24/2021 | Roksana D. Moradi-Brovia | Rev and study Farm st rpt | \$500.00 hr | 0.40 | 0.40 | \$200.00 |
| 02/24/2021 | Roksana D. Moradi-Brovia | Attend st conf (.6), map out to do after and plan accord (.2) | \$500.00 hr | 0.80 | 0.80 | \$400.00 |
| 02/25/2021 | Roksana D. Moradi-Brovia | Lengthy case status email and issues analysis to client | \$500.00 hr | 0.20 | 0.20 | \$100.00 |
| 02/26/2021 | Roksana D. Moradi-Brovia | Meet re case issues, status, todo, strategy with MDR | \$500.00 hr | 0.50 | 0.50 | \$250.00 |
| 03/02/2021 | Roksana D. Moradi-Brovia | Lengthy response to long client email re all mtns and issues pending and plan of action | \$500.00 hr | 0.20 | 0.20 | \$100.00 |
| 03/02/2021 | Sloan Youkstetter | Conference call with RMB and MDR regarding the opposition to the UST motion to dismiss and other issues. | \$350.00 hr | 0.40 | 0.40 | \$140.00 |

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|------------|--------------------------|--|-------------|------|------|------------|
| 03/04/2021 | Sloan Youkstetter | Start drafting the opposition to the UST motion to dismiss. | \$350.00 hr | 1.00 | 1.00 | \$350.00 |
| 03/04/2021 | Sloan Youkstetter | Confer with RMB regarding the opposition to the UST motion to dismiss. | \$350.00 hr | 0.10 | 0.10 | \$35.00 |
| 03/05/2021 | Roksana D. Moradi-Brovia | Rev ct ord moving the st conf to the time of the mfr and the ust mtn dism and plan accord | \$500.00 hr | 0.10 | 0.10 | \$50.00 |
| 03/08/2021 | Roksana D. Moradi-Brovia | Work on, revise draft opp to UST mtn dism/comvert | \$500.00 hr | 1.00 | 1.00 | \$500.00 |
| 03/08/2021 | Roksana D. Moradi-Brovia | Exchange 2x email w client re comments/edit to opp to ust mtn dism | \$500.00 hr | 0.20 | 0.20 | \$100.00 |
| 03/08/2021 | Sloan Youkstetter | Confer with RMB regarding the opposition to the UST motion to dismiss. [.5] Email correspondence with the client regarding the opposition and its declaration. [.1] Email correspondence with the client regarding rents. [.1] | \$350.00 hr | 0.70 | 0.70 | \$245.00 |
| 03/08/2021 | Sloan Youkstetter | Review, revise, and finalize the opposition to the UST motion to dismiss, including legal research. | \$350.00 hr | 4.00 | 4.00 | \$1,400.00 |
| 03/17/2021 | Roksana D. Moradi-Brovia | Rev and study: ust reply to opp to ust mtn dism; farm joinder in ust mtn dism | \$500.00 hr | 0.50 | 0.50 | \$250.00 |
| 03/18/2021 | Roksana D. Moradi-Brovia | Rev email from ust re mor late, email client re same, review his lengthy email re same and then reply to ust | \$500.00 hr | 0.20 | 0.20 | \$100.00 |
| 03/19/2021 | Roksana D. Moradi-Brovia | Rev case todo, status, issues w/MDR | \$500.00 hr | 0.50 | 0.50 | \$250.00 |
| 03/19/2021 | Roksana D. Moradi-Brovia | F/up email to client re late MOR, exchange 2x email re same | \$500.00 hr | 0.20 | 0.20 | \$100.00 |

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|------------|--------------------------|--|-------------|------|------|----------|
| 03/22/2021 | Roksana D. Moradi-Brovia | Rev email from client and from mor prep re Feb MOR, reply and text client re same | \$500.00 hr | 0.20 | 0.20 | \$100.00 |
| 03/22/2021 | Roksana D. Moradi-Brovia | Prep for st conf, hrg on rhm first interim fee app, ust mtn dism, cont'd mfr hrg, hilco emp app hrg (1.1), email Farm counsel re tenta and dates | \$500.00 hr | 1.20 | 1.20 | \$600.00 |
| 03/22/2021 | Roksana D. Moradi-Brovia | Attend hrgs via ct call: st conf, hrg on rhm first interim fee app, ust mtn dism, cont'd mfr hrg, hilco emp app hrg (.8), email and text client results (.1); map out todo and make plan of action re all (.2) | \$500.00 hr | 1.10 | 1.10 | \$550.00 |
| 03/23/2021 | Roksana D. Moradi-Brovia | Rev email from ust re why the mor is late, email client re same and review his long reply and than email ust re same | \$500.00 hr | 0.20 | 0.20 | \$100.00 |
| 03/25/2021 | Roksana D. Moradi-Brovia | rev Feb MOR, make lengthy and extensive comments/edits to client and MOR preparer plus draft a supp chart (1.2), email UST re progress on late report (.1) | \$500.00 hr | 1.30 | 1.30 | \$650.00 |
| 03/26/2021 | Roksana D. Moradi-Brovia | Revise the Feb MOR again, revise the rents chart, draft a dozen question and edits for client and mor prep | \$500.00 hr | 1.20 | 1.20 | \$600.00 |
| 03/29/2021 | Roksana D. Moradi-Brovia | rev email and info from client on updated rents chart then revise it all and send back | \$500.00 hr | 0.30 | 0.30 | \$150.00 |
| 03/30/2021 | Roksana D. Moradi-Brovia | Exchange 3x mor email w client and mor prep re Feb report and then make further edits | \$500.00 hr | 0.50 | 0.50 | \$250.00 |
| 03/31/2021 | Roksana D. Moradi-Brovia | Meet w Rosario re miss compl and UST todo, issues | \$500.00 hr | 0.50 | 0.50 | \$250.00 |
| 04/12/2021 | Roksana D. Moradi-Brovia | Rev case issues, status, to-do w SY and MDR | \$500.00 hr | 0.50 | 0.50 | \$250.00 |
| 04/13/2021 | Roksana D. Moradi-Brovia | Rev email from MOR prep re March rpt issues | \$500.00 hr | 0.10 | 0.10 | \$50.00 |

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|------------|--------------------------|--|-------------|------|------|----------|
| 04/19/2021 | Roksana D. Moradi-Brovia | Rev ust/mor/compliance/etc status/issues w/RZ | \$500.00 hr | 0.30 | 0.30 | \$150.00 |
| 04/19/2021 | Roksana D. Moradi-Brovia | Rev and rep to email from UST re missing MOR and then email client re same w comments | \$500.00 hr | 0.20 | 0.20 | \$100.00 |
| 04/22/2021 | Sloan Youkstetter | Confer with RMB and RS regarding the March monthly operating report. | \$350.00 hr | 0.30 | 0.30 | \$105.00 |
| 04/28/2021 | Roksana D. Moradi-Brovia | Rev another email from ust re where is March MOR, reply and then email client re same | \$500.00 hr | 0.20 | 0.20 | \$100.00 |
| 05/03/2021 | Roksana D. Moradi-Brovia | Rev and study UST's NOTICE OF DEBTOR'S FAILURE TO COMPLY WITH LOCAL BANKRUPTCY RULE 2015-2(a) AND U.S. TRUSTEE'S NOTICE OF REQUIREMENTS | \$500.00 hr | 0.20 | 0.20 | \$100.00 |
| 05/14/2021 | Roksana D. Moradi-Brovia | Rev an d study SUPPLEMENTAL BY UNITED STATES TRUSTEE IN SUPPORT OF MOTION TO DISMISS OR CONVERT CASE PURSUANT TO 11 U.S.C. SECTION 1112(b); DECLARATION OF JAIMEE ZAYICEK; POINTS AND AUTHORITIES AND EXHIBITS | \$500.00 hr | 0.30 | 0.30 | \$150.00 |
| 05/17/2021 | Roksana D. Moradi-Brovia | Rev client email re SUPPLEMENTAL BY UNITED STATES TRUSTEE IN SUPPORT OF MOTION TO DISMISS OR CONVERT CASE | \$500.00 hr | 0.10 | 0.10 | \$50.00 |
| 05/18/2021 | Roksana D. Moradi-Brovia | Rev issues and case status - meet w MDR and RZ re same | \$500.00 hr | 0.50 | 0.50 | \$250.00 |
| 05/18/2021 | Roksana D. Moradi-Brovia | Rev email from client re new insur policy and email client re same w Q | \$500.00 hr | 0.20 | 0.20 | \$100.00 |
| 05/24/2021 | Roksana D. Moradi-Brovia | Rev updated insur and email client re same | \$500.00 hr | 0.10 | 0.10 | \$50.00 |
| 05/25/2021 | Roksana D. Moradi-Brovia | Rev two emails from ust re question on insurance and then email client re same (.2), review client 3x response and reply | \$500.00 hr | 0.30 | 0.30 | \$150.00 |

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|------------|--------------------------|---|-------------|--------------|--------------|--------------------|
| 05/26/2021 | Roksana D. Moradi-Brovia | F/up email to client re UST questions on insurance | \$500.00 hr | 0.10 | 0.10 | \$50.00 |
| 06/02/2021 | Roksana D. Moradi-Brovia | Email client re update for ct re status of sale | \$500.00 hr | 0.10 | 0.10 | \$50.00 |
| 06/03/2021 | Roksana D. Moradi-Brovia | Rev 2x email from client re status and reply | \$500.00 hr | 0.20 | 0.20 | \$100.00 |
| 06/07/2021 | Roksana D. Moradi-Brovia | Draft st rpt and dec and email to client and broker for review/comment | \$500.00 hr | 1.20 | 1.20 | \$600.00 |
| 06/07/2021 | Roksana D. Moradi-Brovia | Rev and rep to email from client and one from Hllco re edits to status report (.2), make edits (.2) | \$500.00 hr | 0.40 | 0.40 | \$200.00 |
| 06/11/2021 | Roksana D. Moradi-Brovia | Draft supp to st rpt and dec and email for review/comment after review of bid summary from Hilco and analysis | \$500.00 hr | 1.10 | 1.10 | \$550.00 |
| 06/13/2021 | Roksana D. Moradi-Brovia | Prep for cont'd ust mtn dism, st conf, mfr | \$500.00 hr | 0.50 | 0.50 | \$250.00 |
| 06/14/2021 | Roksana D. Moradi-Brovia | Attend cont hrg mtn dism/convert, mfr, st conf (.6), send client results | \$500.00 hr | 0.70 | 0.70 | \$350.00 |
| | | | | 29.90 | 29.90 | \$13,870.00 |

Cash Collateral

| | | | | | | |
|------------|----------------|---|-------------|-------------|-------------|-----------------|
| 02/16/2021 | Matthew Resnik | review mor in anticipation of the proposal along with property tax disbursement. Rd of proposal prior to confirmation of amounts. | \$550.00 hr | 0.50 | 0.50 | \$275.00 |
| | | | | 0.50 | 0.50 | \$275.00 |

| Disclosure Statement and Plan of Reorganization | | | | | | |
|--|--------------------------|---|-------------|-------------|-------------|-------------------|
| 02/05/2021 | Roksana D. Moradi-Brovia | Prep for hrg mtn extend exclus and review tenta (.4), then email client and Far counsel re same w comments (.2) | \$500.00 hr | 0.60 | 0.60 | \$300.00 |
| 02/05/2021 | Sloan Youkstetter | Confer with RMB regarding the Court's tentative on the exclusivity motion. [.2] Review the Court's tentative. [.1] | \$350.00 hr | 0.30 | 0.30 | \$105.00 |
| 02/08/2021 | Roksana D. Moradi-Brovia | Rev and rep to email from atty Reed re Farm will sub on Mtn Extend Exclus tenta and then call chambers re same (.1) | \$500.00 hr | 0.20 | 0.20 | \$100.00 |
| 02/08/2021 | Roksana D. Moradi-Brovia | Attend hrg mtn extend exclusivity (.4), map out todo after and plan accord (.1), email Farm counsel re same | \$500.00 hr | 0.60 | 0.60 | \$300.00 |
| 02/08/2021 | Roksana D. Moradi-Brovia | Draft ord on mtn extend exclusivity and ntc lodge re same | \$500.00 hr | 0.60 | 0.60 | \$300.00 |
| 02/16/2021 | Roksana D. Moradi-Brovia | Rev and study ORDER GRANTING DEBTOR'S MOTION TO EXTEND EXCLUSIVITY PERIOD TO FILE A CHAPTER 11 PLAN OF REORGANIZATION for accuracy and any edit by ct | \$500.00 hr | 0.20 | 0.20 | \$100.00 |
| | | | | 2.50 | 2.50 | \$1,205.00 |
| Employment and Fee Application | | | | | | |
| 02/08/2021 | Roksana D. Moradi-Brovia | F/up email to client re broker resume/cv info and then review response with all detailed docs for exb to emp app | \$500.00 hr | 0.40 | 0.40 | \$200.00 |
| 02/08/2021 | Roksana D. Moradi-Brovia | Work on emp app broker and decs and email to client for review/comment | \$500.00 hr | 1.10 | 1.10 | \$550.00 |
| 02/09/2021 | Roksana D. Moradi-Brovia | Rev and rep to client email re draft broker emp app | \$500.00 hr | 0.10 | 0.10 | \$50.00 |

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|------------|--------------------------|--|-------------|------|------|----------|
| 02/10/2021 | Roksana D. Moradi-Brovia | Rev and rep to Hilco re edits to emp app w comments | \$500.00 hr | 0.20 | 0.20 | \$100.00 |
| 02/12/2021 | Roksana D. Moradi-Brovia | Rev and rep to Hilco re edits to emp app w comments (.2); revise the emp app and new exb and finalize for sign and send to all for final rev/comment/sign (.5) | \$500.00 hr | 0.70 | 0.70 | \$350.00 |
| 02/15/2021 | Roksana D. Moradi-Brovia | Draft ntc emp app Hilco | \$500.00 hr | 0.60 | 0.60 | \$300.00 |
| 02/19/2021 | Sloan Youkstetter | Start drafting the first interim fee application. | \$350.00 hr | 2.00 | 2.00 | \$700.00 |
| 02/22/2021 | Sloan Youkstetter | Confer with RMB regarding the first fee application. | \$350.00 hr | 0.10 | 0.10 | \$35.00 |
| 02/22/2021 | Sloan Youkstetter | Review, revise, and finalize the first fee application. | \$350.00 hr | 0.50 | 0.50 | \$175.00 |
| 02/25/2021 | Roksana D. Moradi-Brovia | Work on RHM fee app | \$500.00 hr | 0.50 | 0.50 | \$250.00 |
| 02/26/2021 | Roksana D. Moradi-Brovia | Draft ntc fee app (.4), revise and finalize 1st interim fee app | \$500.00 hr | 0.60 | 0.60 | \$300.00 |
| 03/01/2021 | Roksana D. Moradi-Brovia | Rev and study opp Hilco emp app | \$500.00 hr | 0.50 | 0.50 | \$250.00 |
| 03/03/2021 | Sloan Youkstetter | Confer with RMB regarding the reply to the opposition to Hilco's employment. [.4] Confer with JF regarding withdrawing the notice of hearing and the new notice of hearing. [.2] | \$350.00 hr | 0.60 | 0.60 | \$210.00 |
| 03/03/2021 | Sloan Youkstetter | Review the withdraw of the notice of hearing and the new notice of hearing | \$350.00 hr | 0.30 | 0.30 | \$105.00 |
| 03/03/2021 | Sloan Youkstetter | Started drafting the reply to the opposition to the Hilco employment. | \$350.00 hr | 0.50 | 0.50 | \$175.00 |
| 03/04/2021 | Sloan Youkstetter | Confer with RMB regarding the reply to the opposition to the Hilco employment. | \$350.00 hr | 0.20 | 0.20 | \$70.00 |

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|------------|-----------------------------|---|-------------|--------------|--------------|-------------------|
| 03/04/2021 | Sloan Youkstetter | Continue drafting the reply to the opposition to the Hilco employment. | \$350.00 hr | 2.50 | 2.50 | \$875.00 |
| 03/05/2021 | Roksana D. Moradi-Brovia | Rev email from Hilco re addl infor for reply to opp to their emp app | \$500.00 hr | 0.10 | 0.10 | \$50.00 |
| 03/05/2021 | Sloan Youkstetter | Review and revise the reply to the opposition to the Hilco employment. | \$350.00 hr | 1.00 | 1.00 | \$350.00 |
| 03/05/2021 | Sloan Youkstetter | Confer with RMB and MDR regarding the reply to the opposition to the Hilco employment. | \$350.00 hr | 0.50 | 0.50 | \$175.00 |
| 03/08/2021 | Roksana D. Moradi-Brovia | Work on, revise draft reply to opp to Hilco emp app | \$500.00 hr | 1.00 | 1.00 | \$500.00 |
| 03/08/2021 | Sloan Youkstetter | Review the opposition to the fee application. | \$350.00 hr | 0.10 | 0.10 | \$35.00 |
| 03/08/2021 | Sloan Youkstetter | Confer with RMB regarding the opposition to the fee application. | \$350.00 hr | 0.10 | 0.10 | \$35.00 |
| 03/08/2021 | Sloan Youkstetter | Conduct legal research for the reply. [.5] Review, revise, and finalize the reply to the opposition to the Hilco employment. [.5] | \$350.00 hr | 1.00 | 1.00 | \$350.00 |
| 03/08/2021 | Sloan Youkstetter | Confer with RMB regarding the reply to the opposition to the Hilco employment. | \$350.00 hr | 0.20 | 0.20 | \$70.00 |
| 03/09/2021 | Roksana D. Moradi-Brovia | Rev obj of Farm to RHM fee app | \$500.00 hr | 0.50 | 0.50 | \$250.00 |
| 03/22/2021 | Roksana D. Moradi-Brovia | Draft Hilco ord on emp app and ntc lodge | \$500.00 hr | 0.90 | 0.90 | \$450.00 |
| 03/22/2021 | Roksana D. Moradi-Brovia | Draft ord on first interim fee app RHM and ntc lodge | \$500.00 hr | 0.90 | 0.90 | \$450.00 |
| 03/25/2021 | Roksana D. Moradi-Brovia | REV ent ord on RHM fee app and Hilco emp app for accuracy and any edit by ct | \$500.00 hr | 0.20 | 0.20 | \$100.00 |
| | | | | 17.90 | 17.90 | \$7,510.00 |

| General Creditor Issues | | | | | | |
|-------------------------|--------------------------|---|-------------|------|------|----------|
| 02/08/2021 | Matthew Resnik | Tc with Debtor re - discovery and the other related info | \$550.00 hr | 0.60 | 0.60 | \$330.00 |
| 02/09/2021 | Matthew Resnik | tc with lee and MM PSA agreement discussion - liquidation and taxes. 3.2 taxes and liq analysis | \$550.00 hr | 0.20 | 0.20 | \$110.00 |
| 03/01/2021 | Matthew Resnik | review of opposition. still need ntc of hrg set for 3/22 along with the others the reply will be due 7 days before | \$550.00 hr | 0.70 | 0.70 | \$385.00 |
| 03/08/2021 | Matthew Resnik | corr re the various alternatives and strategies in opposition to the relief from stay but also to the liquidating plan possibility | \$550.00 hr | 0.60 | 0.60 | \$330.00 |
| 03/09/2021 | David Kritzer | Prepare Subpoena for Appraiser to appear at 3/22/MFR hearing; Phone call to appraiser | \$350.00 hr | 0.70 | 0.70 | \$245.00 |
| 03/11/2021 | Matthew Resnik | tc with Reed Waddel re tomorrow tc confirmation for the hearing coming up - discussion re FCW opposition and some of the appraisal issues. Agreed to discuss later time after proposal. | \$550.00 hr | 0.80 | 0.80 | \$440.00 |
| 03/11/2021 | Roksana D. Moradi-Brovia | Rev email from Farm counsel re RR depo off, rev RR counsel reply re same and discovery, email client re same | \$500.00 hr | 0.20 | 0.20 | \$100.00 |
| 03/11/2021 | David Kritzer | Phone call with appraiser re: 3/22 hearing | \$350.00 hr | 0.30 | 0.30 | \$105.00 |
| 03/12/2021 | Matthew Resnik | review of Frandzel objection in preparation for settlement discussions with Reed Waddell for the FCW lien - the property has substantial value perhaps some equity to discuss. | \$550.00 hr | 1.10 | 1.10 | \$605.00 |
| 03/12/2021 | Roksana D. Moradi-Brovia | Rev email from client re appraiser and supp to value re mfr hrg, reply w/all details | \$500.00 hr | 0.20 | 0.20 | \$100.00 |
| 03/15/2021 | Matthew Resnik | TC with Reed Wadeel re status of possib stipulation with hearing a week away. Discussed some parameters and needs to get his clients consent | \$550.00 hr | 0.40 | 0.40 | \$220.00 |
| 03/15/2021 | David Kritzer | Phone call with Appraiser | \$350.00 hr | 0.30 | 0.30 | \$105.00 |

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|------------|--------------------------|---|-------------|------|------|----------|
| 03/17/2021 | Matthew Resnik | Tc with Hilco re status of things and whether or not need to appear for application hearing | \$550.00 hr | 0.40 | 0.40 | \$220.00 |
| 03/17/2021 | Matthew Resnik | fu wth Reed re the status of the proposed stipulation and upcoming hearings for 3222021 | \$550.00 hr | 0.70 | 0.70 | \$385.00 |
| 03/17/2021 | Roksana D. Moradi-Brovia | Rev Farm supp reply to opp mfr | \$500.00 hr | 0.50 | 0.50 | \$250.00 |
| 03/19/2021 | Roksana D. Moradi-Brovia | Rev conty taxes POC (.1), review client email re same and comments | \$500.00 hr | 0.20 | 0.20 | \$100.00 |
| 03/19/2021 | Roksana D. Moradi-Brovia | Rev email from Farm re new discovery and reply and email client re same | \$500.00 hr | 0.20 | 0.20 | \$100.00 |
| 03/22/2021 | David Kritzer | Phone call with appraiser | \$350.00 hr | 0.10 | 0.10 | \$35.00 |
| 03/23/2021 | Matthew Resnik | review of discovery by Frandzel re the particulars of the vineyards and specific info related to revenue etc | \$550.00 hr | 0.80 | 0.80 | \$440.00 |
| 03/24/2021 | Roksana D. Moradi-Brovia | Rev and study Farm West POC | \$500.00 hr | 0.20 | 0.20 | \$100.00 |
| 03/24/2021 | Roksana D. Moradi-Brovia | Rev email from atty Reed and draft interim MFR ord re replacement lien and then exchange 2x email w client re same (.3), then review and reply to Reed f/up re same | \$500.00 hr | 0.40 | 0.40 | \$200.00 |
| 03/25/2021 | Roksana D. Moradi-Brovia | Rev email x3 from client re draft ord on mfr re replace lien and then email atty Reed re executed ord | \$500.00 hr | 0.20 | 0.20 | \$100.00 |
| 03/30/2021 | Roksana D. Moradi-Brovia | rev amended POC County of San Luis Obispo Tax Collector | \$500.00 hr | 0.10 | 0.10 | \$50.00 |
| 04/02/2021 | Roksana D. Moradi-Brovia | Rev POC of Erich L. Russell then email client re same w comments (.3), exchange 2x email re same | \$500.00 hr | 0.50 | 0.50 | \$250.00 |
| 04/13/2021 | Roksana D. Moradi-Brovia | Rev email and revised ord on cont mfr and replace lien from atty Reed and review then reply | \$500.00 hr | 0.30 | 0.30 | \$150.00 |

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|------------|--------------------------|--|-------------|--------------|--------------|--------------------|
| 04/16/2021 | Roksana D. Moradi-Brovia | Rev ent ord cont mfr and grant adeq protection | \$500.00 hr | 0.10 | 0.10 | \$50.00 |
| 04/22/2021 | Roksana D. Moradi-Brovia | Rev email and new disc/depo from Farm and email client re same | \$500.00 hr | 0.20 | 0.20 | \$100.00 |
| 05/03/2021 | Sloan Youkstetter | Confer with RMB, MDR, and DMK regarding the interrogatories. [5] Email correspondence with the client regarding the responses. [1] | \$350.00 hr | 0.60 | 0.60 | \$210.00 |
| 05/03/2021 | Sloan Youkstetter | Draft the responses to the interrogatories. | \$350.00 hr | 0.80 | 0.80 | \$280.00 |
| 05/04/2021 | Sloan Youkstetter | Confer with RMB regarding the interrogatory response. [1] Email correspondence with the client regarding the verification. [1] Email to counsel for the lender regarding the interrogatory response. [1] | \$350.00 hr | 0.30 | 0.30 | \$105.00 |
| 05/04/2021 | Sloan Youkstetter | Review, revise, and finalize the interrogatories response. | \$350.00 hr | 0.40 | 0.40 | \$140.00 |
| | | | | 13.10 | 13.10 | \$6,340.00 |
| | | | | 71.50 | 71.50 | \$33,285.00 |

EXHIBIT “B”

| Date | Category | Description | Rate/ Unit Price | Labor Time/ Quantity | Billable Time/ Cost Price | Bill Amt/ Sell Price |
|--------------------------------------|--|---|---------------------|-------------------------|------------------------------|-------------------------|
| David Kritzer | | | | | | |
| 03/09/2021 | General Creditor Issues | Prepare Subpoena for Appraiser to appear at 3/22/MFR hearing; Phone call to appraiser | \$350.00 hr | 0.70 | 0.70 | \$245.00 |
| 03/11/2021 | General Creditor Issues | Phone call with appraiser re: 3/22 hearing | \$350.00 hr | 0.30 | 0.30 | \$105.00 |
| 03/15/2021 | General Creditor Issues | Phone call with Appraiser | \$350.00 hr | 0.30 | 0.30 | \$105.00 |
| 03/22/2021 | General Creditor Issues | Phone call with appraiser | \$350.00 hr | 0.10 | 0.10 | \$35.00 |
| Total Labor For David Kritzer | | | | 1.40 | 1.40 | \$490.00 |
| Matthew Resnik | | | | | | |
| 02/08/2021 | General Creditor Issues | Tc with Debtor re - discovery and the other related info | \$550.00 hr | 0.60 | 0.60 | \$330.00 |
| 02/09/2021 | General Creditor Issues | tc with lee and MM PSA agreement discussion - liquidation and taxes. 3.2 taxes and liq analysis | \$550.00 hr | 0.20 | 0.20 | \$110.00 |
| 02/12/2021 | ASSET SALE, ANALYSIS AND VALUATION | tc with hilco re confirmation of changes and requirements under the ch 11 Bk and process confirmation | \$550.00 hr | 0.60 | 0.60 | \$330.00 |
| 02/16/2021 | Cash Collateral | review mor in anticipation of the proposal along with property tax disbursement. Rd of proposal prior to confirmation of amounts. | \$550.00 hr | 0.50 | 0.50 | \$275.00 |
| 03/01/2021 | General Creditor Issues | review of opposition. still need ntc of hrg set for 3/22 along with the others the reply will be due 7 days before | \$550.00 hr | 0.70 | 0.70 | \$385.00 |
| 03/03/2021 | ASSET SALE, ANALYSIS AND VALUATION | Tc with RDM over strategy movig forward with purchase and sale offers and the pending stalking horse developments | \$550.00 hr | 0.60 | 0.60 | \$330.00 |

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|------------|--|---|-------------|------|------|----------|
| 03/03/2021 | ASSET SALE, ANALYSIS AND VALUATION | Tc with LC over strategy movig forward with purchase and sale offers and the pending stalking horse developments - requested the additional compliance to create a structure with deadlines as to how we will be moving forward w/possible other developments | \$550.00 hr | 0.60 | 0.60 | \$330.00 |
| 03/03/2021 | ASSET SALE, ANALYSIS AND VALUATION | Tc with RDM over strategy movig forward with purchase and sale offers and the pending stalking horse developments | \$550.00 hr | 0.60 | 0.60 | \$330.00 |
| 03/08/2021 | General Creditor Issues | corr re the various alternatives and strategies in opposition to the relief from stay but also to the liquidating plan possiblity | \$550.00 hr | 0.60 | 0.60 | \$330.00 |
| 03/11/2021 | General Creditor Issues | tc with Reed Waddel re tomorrow tc confirmation for the hearing coming up - discussion re FCW opposition and some of the appraisal issues. Agreed to discuss later time after proposal. | \$550.00 hr | 0.80 | 0.80 | \$440.00 |
| 03/12/2021 | General Creditor Issues | review of Frandzel objection in preparation for settlement discussions with Reed Waddell for the FCW lien - the property has substantial value perhaps some equity to discuss. | \$550.00 hr | 1.10 | 1.10 | \$605.00 |
| 03/15/2021 | General Creditor Issues | TC with Reed Wadeel re status of possib stipulation with hearing a week away. Discussed some parameters and needs to get his clients consent | \$550.00 hr | 0.40 | 0.40 | \$220.00 |
| 03/17/2021 | General Creditor Issues | Tc with Hilco re status of things and whether or not need to appear for application hearing | \$550.00 hr | 0.40 | 0.40 | \$220.00 |
| 03/17/2021 | General Creditor Issues | fu with Reed re the status of the proposed stipulation and upcoming hearings for 3222021 | \$550.00 hr | 0.70 | 0.70 | \$385.00 |
| 03/22/2021 | ASSET SALE, ANALYSIS AND VALUATION | corr with Hilco re the approval of the sale and finance | \$550.00 hr | 0.60 | 0.60 | \$330.00 |
| 03/23/2021 | General Creditor Issues | review of discovery by Frandzel re the particulars of the vineyards and specific info related to revenue etc | \$550.00 hr | 0.80 | 0.80 | \$440.00 |

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|---------------------------------------|------------------------------------|---|-------------|--------------|--------------|-------------------|
| 06/04/2021 | ASSET SALE, ANALYSIS AND VALUATION | Tc with Hilco and DIP re status of case and any of the progress made | \$550.00 hr | 0.70 | 0.70 | \$385.00 |
| 06/11/2021 | ASSET SALE, ANALYSIS AND VALUATION | review various letter of intent from the broker Hilco re the stat conf and prep for meeting | \$550.00 hr | 0.70 | 0.70 | \$385.00 |
| 06/11/2021 | ASSET SALE, ANALYSIS AND VALUATION | TC with Hilco, RDM and LC managing member re status of sale and strategy moving forward | \$550.00 hr | 0.60 | 0.60 | \$330.00 |
| 06/14/2021 | ASSET SALE, ANALYSIS AND VALUATION | tc related to issues in the hearing, MORS and valuation related to the ongoing ch 11 and just mxn to dx | \$550.00 hr | 0.70 | 0.70 | \$385.00 |
| Total Labor For Matthew Resnik | | | | 12.50 | 12.50 | \$6,875.00 |

Roksana D. Moradi-Brovia

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|------------|---|---|-------------|------|------|----------|
| 02/05/2021 | Disclosure Statement and Plan of Reorganization | Prep for hrg mtn extend exclus and review tenta (.4), then email client and Far counsel re same w comments (.2) | \$500.00 hr | 0.60 | 0.60 | \$300.00 |
| 02/08/2021 | Disclosure Statement and Plan of Reorganization | Rev and rep to email from atty Reed re Farm will sub on Mtn Extend Exclus tenta and then call chambers re same (.1) | \$500.00 hr | 0.20 | 0.20 | \$100.00 |
| 02/08/2021 | Employment and Fee Application | F/up email to client re broker resume/cv info and then review response with all detailed docs for exb to emp app | \$500.00 hr | 0.40 | 0.40 | \$200.00 |
| 02/08/2021 | Disclosure Statement and Plan of Reorganization | Attend hrg mtn extend exclusivity (.4), map out todo after and plan accord (.1), email Farm counsel re same | \$500.00 hr | 0.60 | 0.60 | \$300.00 |

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|------------|---|--|-------------|------|------|----------|
| 02/08/2021 | Disclosure Statement and Plan of Reorganization | Draft ord on mtn extend exclusivity and ntc lodge re same | \$500.00 hr | 0.60 | 0.60 | \$300.00 |
| 02/08/2021 | Case Administration | Draft st rpt and dec and email all to client for rev/comment | \$500.00 hr | 0.90 | 0.90 | \$450.00 |
| 02/08/2021 | Employment and Fee Application | Work on emp app broker and decs and email to client for review/comment | \$500.00 hr | 1.10 | 1.10 | \$550.00 |
| 02/09/2021 | Employment and Fee Application | Rev and rep to client email re draft broker emp app | \$500.00 hr | 0.10 | 0.10 | \$50.00 |
| 02/09/2021 | Case Administration | Rev client email re draft 2nd st rpt and reply and then make the edits | \$500.00 hr | 0.30 | 0.30 | \$150.00 |
| 02/10/2021 | Employment and Fee Application | Rev and rep to Hilco re edits to emp app w comments | \$500.00 hr | 0.20 | 0.20 | \$100.00 |
| 02/10/2021 | Case Administration | Rev email from client re add/l info for st rpt and then make the final edits | \$500.00 hr | 0.40 | 0.40 | \$200.00 |
| 02/12/2021 | Employment and Fee Application | Rev and rep to Hilco re edits to emp app w comments (.2); revise the emp app and new exb and finalize for sign and send to all for final rev/comment/sign (.5) | \$500.00 hr | 0.70 | 0.70 | \$350.00 |
| 02/15/2021 | Employment and Fee Application | Draft ntc emp app Hilco | \$500.00 hr | 0.60 | 0.60 | \$300.00 |
| 02/15/2021 | Case Administration | Rev Jan MOR draft, send back comments to mor prep and client | \$500.00 hr | 0.30 | 0.30 | \$150.00 |
| 02/16/2021 | Disclosure Statement and Plan of Reorganization | Rev and study ORDER GRANTING DEBTOR'S MOTION TO EXTEND EXCLUSIVITY PERIOD TO FILE A CHAPTER 11 PLAN OF REORGANIZATION for accuracy and any edit by ct | \$500.00 hr | 0.20 | 0.20 | \$100.00 |
| 02/17/2021 | Case Administration | Rev and study UST mtn dism | \$500.00 hr | 0.50 | 0.50 | \$250.00 |
| 02/17/2021 | Case Administration | Rev and rep to email from client re ust mtn dism details | \$500.00 hr | 0.20 | 0.20 | \$100.00 |
| 02/19/2021 | Case Administration | Review ust compliance, mors, insur, case status with RZ | \$500.00 hr | 0.40 | 0.40 | \$200.00 |

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|------------|------------------------------------|--|-------------|------|------|----------|
| 02/22/2021 | Case Administration | Rev lengthily email from client re info for opp ust mtn plus new PSA, then start outlining the opp to mtn dism | \$500.00 hr | 0.50 | 0.50 | \$250.00 |
| 02/23/2021 | Case Administration | Rev and rep to email from client re updates on the case for the st conf | \$500.00 hr | 0.20 | 0.20 | \$100.00 |
| 02/23/2021 | Case Administration | Prep for st conf | \$500.00 hr | 0.40 | 0.40 | \$200.00 |
| 02/24/2021 | Case Administration | Rev and study Farm st rpt | \$500.00 hr | 0.40 | 0.40 | \$200.00 |
| 02/24/2021 | Case Administration | Attend st conf (.6), map out to do after and plan accord (.2) | \$500.00 hr | 0.80 | 0.80 | \$400.00 |
| 02/25/2021 | Employment and Fee Application | Work on RHM fee app | \$500.00 hr | 0.50 | 0.50 | \$250.00 |
| 02/25/2021 | Case Administration | Lengthy case status email and issues analysis to client | \$500.00 hr | 0.20 | 0.20 | \$100.00 |
| 02/26/2021 | ASSET SALE, ANALYSIS AND VALUATION | Rev and rep to email from client re issue w appraiser provide supp to value | \$500.00 hr | 0.10 | 0.10 | \$50.00 |
| 02/26/2021 | Case Administration | Meet re case issues, status, todo, strategy with MDR | \$500.00 hr | 0.50 | 0.50 | \$250.00 |
| 02/26/2021 | Employment and Fee Application | Draft ntc fee app (.4), revise and finalize 1st interim fee app | \$500.00 hr | 0.60 | 0.60 | \$300.00 |
| 03/01/2021 | Employment and Fee Application | Rev and study opp Hilco emp app | \$500.00 hr | 0.50 | 0.50 | \$250.00 |
| 03/02/2021 | Case Administration | Lengthy response to long client email re all mtns and issues pending and plan of action | \$500.00 hr | 0.20 | 0.20 | \$100.00 |
| 03/05/2021 | Employment and Fee Application | Rev email from Hilco re addl infor for reply to opp to their emp app | \$500.00 hr | 0.10 | 0.10 | \$50.00 |
| 03/05/2021 | Case Administration | Rev ct ord moving the st conf to the time of the mfr and the ust mtn dism and plan accord | \$500.00 hr | 0.10 | 0.10 | \$50.00 |
| 03/08/2021 | Employment and Fee Application | Work on, revise draft reply to opp to Hilco emp app | \$500.00 hr | 1.00 | 1.00 | \$500.00 |
| 03/08/2021 | Case Administration | Work on, revise draft opp to UST mtn dism/convert | \$500.00 hr | 1.00 | 1.00 | \$500.00 |

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|------------|--------------------------------|--|-------------|------|------|----------|
| 03/08/2021 | Case Administration | Exchange 2x email w client re comments/edit to opp to ust mtn dism | \$500.00 hr | 0.20 | 0.20 | \$100.00 |
| 03/09/2021 | Employment and Fee Application | Rev obj of Farm to RHM fee app | \$500.00 hr | 0.50 | 0.50 | \$250.00 |
| 03/11/2021 | General Creditor Issues | Rev email from Farm counsel re RR depo off, rev RR counsel reply re same and discovery, email client re same | \$500.00 hr | 0.20 | 0.20 | \$100.00 |
| 03/12/2021 | General Creditor Issues | Rev email from client re appraiser and supp to value re mfr hrg, reply w/all details | \$500.00 hr | 0.20 | 0.20 | \$100.00 |
| 03/17/2021 | Case Administration | Rev and study: ust reply to opp to ust mtn dism; farm joinder in ust mtn dism | \$500.00 hr | 0.50 | 0.50 | \$250.00 |
| 03/17/2021 | General Creditor Issues | Rev Farm supp reply to opp mfr | \$500.00 hr | 0.50 | 0.50 | \$250.00 |
| 03/18/2021 | Case Administration | Rev email from ust re mor late, email client re same, review his lengthy email re same and then reply to ust | \$500.00 hr | 0.20 | 0.20 | \$100.00 |
| 03/19/2021 | Case Administration | Rev case todo, status, issues w/MDR | \$500.00 hr | 0.50 | 0.50 | \$250.00 |
| 03/19/2021 | General Creditor Issues | Rev conty taxes POC (.1), review client email re same and comments | \$500.00 hr | 0.20 | 0.20 | \$100.00 |
| 03/19/2021 | General Creditor Issues | Rev email from Farm re new discovery and reply and email client re same | \$500.00 hr | 0.20 | 0.20 | \$100.00 |
| 03/19/2021 | Case Administration | F/up email to client re late MOR, exchange 2x email re same | \$500.00 hr | 0.20 | 0.20 | \$100.00 |
| 03/22/2021 | Case Administration | Rev email from client and from mor prep re Feb MOR, reply and text client re same | \$500.00 hr | 0.20 | 0.20 | \$100.00 |
| 03/22/2021 | Case Administration | Prep for st conf, hrg on rhm first interim fee app, ust mtn dism, cont'd mfr hrg, hilco emp app hrg (1.1), email Farm counsel re tenta and dates | \$500.00 hr | 1.20 | 1.20 | \$600.00 |
| 03/22/2021 | Case Administration | Attend hrgs via ct call: st conf, hrg on rhm first interim fee app, ust mtn dism, cont'd mfr hrg, hilco emp app hrg (.8), email and text client results (.1); map out todo and make plan of action re all (.2) | \$500.00 hr | 1.10 | 1.10 | \$550.00 |

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|------------|--------------------------------|---|-------------|------|------|----------|
| 03/22/2021 | Employment and Fee Application | Draft Hilco ord on emp app and ntc lodge | \$500.00 hr | 0.90 | 0.90 | \$450.00 |
| 03/22/2021 | Employment and Fee Application | Draft ord on first interim fee app RHM and ntc lodge | \$500.00 hr | 0.90 | 0.90 | \$450.00 |
| 03/23/2021 | Case Administration | Rev email from ust re why the mor is late, email client re same and review his long reply and than email ust re same | \$500.00 hr | 0.20 | 0.20 | \$100.00 |
| 03/24/2021 | General Creditor Issues | Rev and study Farm West POC | \$500.00 hr | 0.20 | 0.20 | \$100.00 |
| 03/24/2021 | General Creditor Issues | Rev email from atty Reed and draft interim MFR ord re replacement lien and then exchange 2x email w client re same (.3), then review and reply to Reed f/up re same | \$500.00 hr | 0.40 | 0.40 | \$200.00 |
| 03/25/2021 | Employment and Fee Application | REV ent ord on RHM fee app and Hilco emp app for accuracy and any edit by ct | \$500.00 hr | 0.20 | 0.20 | \$100.00 |
| 03/25/2021 | General Creditor Issues | Rev email x3 from client re draft ord on mfr re replace lien and then email atty Reed re executed ord | \$500.00 hr | 0.20 | 0.20 | \$100.00 |
| 03/25/2021 | Case Administration | rev Feb MOR, make lengthy and extensive comments/edits to client and MOR preparer plus draft a supp chart (1.2), email UST re progress on late report (.1) | \$500.00 hr | 1.30 | 1.30 | \$650.00 |
| 03/26/2021 | Case Administration | Revise the Feb MOR again, revise the rents chart, draft a dozen question and edits for client and mor prep | \$500.00 hr | 1.20 | 1.20 | \$600.00 |
| 03/29/2021 | Case Administration | rev email and info from client on updated rents chart then revise it all and send back | \$500.00 hr | 0.30 | 0.30 | \$150.00 |
| 03/30/2021 | Case Administration | Exchange 3x mor email w client and mor prep re Feb report and then make further edits | \$500.00 hr | 0.50 | 0.50 | \$250.00 |
| 03/30/2021 | General Creditor Issues | rev amended POC County of San Luis Obispo Tax Collector | \$500.00 hr | 0.10 | 0.10 | \$50.00 |
| 03/31/2021 | Case Administration | Meet w Rosario re miss compl and UST todo, issues | \$500.00 hr | 0.50 | 0.50 | \$250.00 |

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|------------|------------------------------------|--|-------------|------|------|----------|
| 04/02/2021 | General Creditor Issues | Rev POC of Erich L. Russell then email client re same w comments (.3), exchange 2x email re same | \$500.00 hr | 0.50 | 0.50 | \$250.00 |
| 04/12/2021 | Case Administration | Rev case issues, status, to-do w SY and MDR | \$500.00 hr | 0.50 | 0.50 | \$250.00 |
| 04/13/2021 | ASSET SALE, ANALYSIS AND VALUATION | Rev client email re status of sale efforts | \$500.00 hr | 0.10 | 0.10 | \$50.00 |
| 04/13/2021 | General Creditor Issues | Rev email and revised ord on cont mfr and replace lien from atty Reed and review then reply | \$500.00 hr | 0.30 | 0.30 | \$150.00 |
| 04/13/2021 | Case Administration | Rev email from MOR prep re March rpt issues | \$500.00 hr | 0.10 | 0.10 | \$50.00 |
| 04/16/2021 | General Creditor Issues | Rev ent ord cont mfr and grant adeq protection | \$500.00 hr | 0.10 | 0.10 | \$50.00 |
| 04/19/2021 | Case Administration | Rev ust/mor/compliance/etc status/issues w/RZ | \$500.00 hr | 0.30 | 0.30 | \$150.00 |
| 04/19/2021 | Case Administration | Rev and rep to email from UST re missing MOR and then email client re same w comments | \$500.00 hr | 0.20 | 0.20 | \$100.00 |
| 04/22/2021 | General Creditor Issues | Rev email and new disc/depo from Farm and email client re same | \$500.00 hr | 0.20 | 0.20 | \$100.00 |
| 04/28/2021 | Case Administration | Rev another email from ust re where is March MOR, reply and then email client re same | \$500.00 hr | 0.20 | 0.20 | \$100.00 |
| 05/03/2021 | Case Administration | Rev and study UST's NOTICE OF DEBTOR'S FAILURE TO COMPLY WITH LOCAL BANKRUPTCY RULE 2015-2(a) AND U.S. TRUSTEE'S NOTICE OF REQUIREMENTS | \$500.00 hr | 0.20 | 0.20 | \$100.00 |
| 05/14/2021 | Case Administration | Rev an d study SUPPLEMENTAL BY UNITED STATES TRUSTEE IN SUPPORT OF MOTION TO DISMISS OR CONVERT CASE PURSUANT TO 11 U.S.C. SECTION 1112(b); DECLARATION OF JAIMEE ZAYICEK; POINTS AND AUTHORITIES AND EXHIBITS | \$500.00 hr | 0.30 | 0.30 | \$150.00 |
| 05/17/2021 | Case Administration | Rev client email re SUPPLEMENTAL BY UNITED STATES TRUSTEE IN SUPPORT OF MOTION TO DISMISS OR CONVERT CASE | \$500.00 hr | 0.10 | 0.10 | \$50.00 |
| 05/18/2021 | Case Administration | Rev issues and case status - meet w MDR and RZ re same | \$500.00 hr | 0.50 | 0.50 | \$250.00 |

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|------------|--|--|-------------|------|------|----------|
| 05/18/2021 | ASSET SALE, ANALYSIS AND VALUATION | Rev email from pros buyer and email client re same then review response re plan of action | \$500.00 hr | 0.20 | 0.20 | \$100.00 |
| 05/18/2021 | Case Administration | Rev email from client re new insur policy and email client re same w Q | \$500.00 hr | 0.20 | 0.20 | \$100.00 |
| 05/24/2021 | Case Administration | Rev updated insur and email client re same | \$500.00 hr | 0.10 | 0.10 | \$50.00 |
| 05/25/2021 | Case Administration | Rev two emails from ust re question on insurance and then email client re same (.2), review client 3x response and reply | \$500.00 hr | 0.30 | 0.30 | \$150.00 |
| 05/26/2021 | Case Administration | F/up email to client re UST questions on insurance | \$500.00 hr | 0.10 | 0.10 | \$50.00 |
| 06/02/2021 | Case Administration | Email client re update for ct re status of sale | \$500.00 hr | 0.10 | 0.10 | \$50.00 |
| 06/03/2021 | Case Administration | Rev 2x email from client re status and reply | \$500.00 hr | 0.20 | 0.20 | \$100.00 |
| 06/04/2021 | ASSET SALE, ANALYSIS AND VALUATION | TC w client and Hilco team re status (.6), then call w client re same (.1) | \$500.00 hr | 0.70 | 0.70 | \$350.00 |
| 06/07/2021 | ASSET SALE, ANALYSIS AND VALUATION | Rev 2 emails w all details on interest in the properties from client and broker | \$500.00 hr | 0.30 | 0.30 | \$150.00 |
| 06/07/2021 | Case Administration | Draft st rpt and dec and email to client and broker for review/comment | \$500.00 hr | 1.20 | 1.20 | \$600.00 |
| 06/07/2021 | Case Administration | Rev and rep to email from client and one from Hilco re edits to status report (.2), make edits (.2) | \$500.00 hr | 0.40 | 0.40 | \$200.00 |
| 06/11/2021 | Case Administration | Draft supp to st rpt and dec and email for review/comment after review of bid summary from Hilco and analysis | \$500.00 hr | 1.10 | 1.10 | \$550.00 |
| 06/11/2021 | ASSET SALE, ANALYSIS AND VALUATION | TC client and Hilco team re all bids rec and status | \$500.00 hr | 0.50 | 0.50 | \$250.00 |
| 06/13/2021 | Case Administration | Prep for cont'd ust mtn dism, st conf, mfr | \$500.00 hr | 0.50 | 0.50 | \$250.00 |

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| 06/14/2021 | Case Administration | Attend cont hrg mtn dism/convert, mfr, st conf (.6), send client results | \$500.00 hr | 0.70 | 0.70 | \$350.00 |
| Total Labor For Roksana D. Moradi-Brovia | | | | 38.40 | 38.40 | \$19,200.00 |

Sloan Youkstetter

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|------------|---|--|-------------|------|------|----------|
| 02/05/2021 | Disclosure Statement and Plan of Reorganization | Confer with RMB regarding the Court's tentative on the exclusivity motion. [.2] Review the Court's tentative. [.1] | \$350.00 hr | 0.30 | 0.30 | \$105.00 |
| 02/18/2021 | Case Administration | Review the UST's motion to dismiss. | \$350.00 hr | 0.30 | 0.30 | \$105.00 |
| 02/19/2021 | Employment and Fee Application | Start drafting the first interim fee application. | \$350.00 hr | 2.00 | 2.00 | \$700.00 |
| 02/19/2021 | Case Administration | Review the US Trustee's motion to dismiss. | \$350.00 hr | 0.40 | 0.40 | \$140.00 |
| 02/22/2021 | Employment and Fee Application | Confer with RMB regarding the first fee application. | \$350.00 hr | 0.10 | 0.10 | \$35.00 |
| 02/22/2021 | Employment and Fee Application | Review, revise, and finalize the first fee application. | \$350.00 hr | 0.50 | 0.50 | \$175.00 |
| 03/02/2021 | Case Administration | Conference call with RMB and MDR regarding the opposition to the UST motion to dismiss and other issues. | \$350.00 hr | 0.40 | 0.40 | \$140.00 |
| 03/03/2021 | Employment and Fee Application | Review the withdraw of the notice of hearing and the new notice of hearing | \$350.00 hr | 0.30 | 0.30 | \$105.00 |
| 03/03/2021 | Employment and Fee Application | Confer with RMB regarding the reply to the opposition to Hilco's employment. [.4] Confer with JF regarding withdrawing the notice of hearing and the new notice of hearing. [.2] | \$350.00 hr | 0.60 | 0.60 | \$210.00 |
| 03/03/2021 | Employment and Fee Application | Started drafting the reply to the opposition to the Hilco employment. | \$350.00 hr | 0.50 | 0.50 | \$175.00 |
| 03/04/2021 | Case Administration | Confer with RMB regarding the opposition to the UST motion to dismiss. | \$350.00 hr | 0.10 | 0.10 | \$35.00 |

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|------------|--------------------------------|--|-------------|------|------|------------|
| 03/04/2021 | Case Administration | Start drafting the opposition to the UST motion to dismiss. | \$350.00 hr | 1.00 | 1.00 | \$350.00 |
| 03/04/2021 | Employment and Fee Application | Confer with RMB regarding the reply to the opposition to the Hilco employment. | \$350.00 hr | 0.20 | 0.20 | \$70.00 |
| 03/04/2021 | Employment and Fee Application | Continue drafting the reply to the opposition to the Hilco employment. | \$350.00 hr | 2.50 | 2.50 | \$875.00 |
| 03/05/2021 | Employment and Fee Application | Review and revise the reply to the opposition to the Hilco employment. | \$350.00 hr | 1.00 | 1.00 | \$350.00 |
| 03/05/2021 | Employment and Fee Application | Confer with RMB and MDR regarding the reply to the opposition to the Hilco employment. | \$350.00 hr | 0.50 | 0.50 | \$175.00 |
| 03/08/2021 | Employment and Fee Application | Review the opposition to the fee application. | \$350.00 hr | 0.10 | 0.10 | \$35.00 |
| 03/08/2021 | Employment and Fee Application | Confer with RMB regarding the opposition to the fee application. | \$350.00 hr | 0.10 | 0.10 | \$35.00 |
| 03/08/2021 | Case Administration | Review, revise, and finalize the opposition to the UST motion to dismiss, including legal research. | \$350.00 hr | 4.00 | 4.00 | \$1,400.00 |
| 03/08/2021 | Case Administration | Confer with RMB regarding the opposition to the UST motion to dismiss. [.5] Email correspondence with the client regarding the opposition and its declaration. [.1] Email correspondence with the client regarding rents. [.1] | \$350.00 hr | 0.70 | 0.70 | \$245.00 |
| 03/08/2021 | Employment and Fee Application | Conduct legal research for the reply. [.5] Review, revise, and finalize the reply to the opposition to the Hilco employment. [.5] | \$350.00 hr | 1.00 | 1.00 | \$350.00 |
| 03/08/2021 | Employment and Fee Application | Confer with RMB regarding the reply to the opposition to the Hilco employment. | \$350.00 hr | 0.20 | 0.20 | \$70.00 |
| 04/22/2021 | Case Administration | Confer with RMB and RS regarding the March monthly operating report. | \$350.00 hr | 0.30 | 0.30 | \$105.00 |
| 05/03/2021 | General Creditor Issues | Confer with RMB, MDR, and DMK regarding the interrogatories. [.5] Email correspondence with the client regarding the responses. [.1] | \$350.00 hr | 0.60 | 0.60 | \$210.00 |
| 05/03/2021 | General Creditor Issues | Draft the responses to the interrogatories. | \$350.00 hr | 0.80 | 0.80 | \$280.00 |

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| 05/04/2021 | General Creditor Issues | Confer with RMB regarding the interrogatory response. [.1] Email correspondence with the client regarding the verification. [.1] Email to counsel for the lender regarding the interrogatory response. [.1] | \$350.00 hr | 0.30 | 0.30 | \$105.00 |
| 05/04/2021 | General Creditor Issues | Review, revise, and finalize the interrogatories response. | \$350.00 hr | 0.40 | 0.40 | \$140.00 |
| Total Labor For Sloan Youkstetter | | | | 19.20 | 19.20 | \$6,720.00 |
| Total Labor For Northern Holdings, LLC | | | | 71.50 | 71.50 | \$33,285.00 |

EXHIBIT “C”

Date Start: 2/5/2021 | Date End: 6/15/2021 | Clients: Northern Holdings, LLC | Categories: | Users: All | Group By: Client

| Expense Date | Client | Category | User | Expense Type | Description | Status | Cost | Bill Price |
|--|------------------------|----------------------|--------------------------|-----------------|--|------------------|----------|------------|
| Northern Holdings, LLC | | | | | | | | |
| 02/08/2021 | Northern Holdings, LLC | Non-Category Related | Roksana D. Moradi-Brovja | Court Call | courtcall hearing on motion extend exclusivity to file Plan | Billing Complete | \$26.25 | \$26.25 |
| 02/10/2021 | Northern Holdings, LLC | Non-Category Related | Rebeca Benitez | Mailing/Postage | ntc of lodgment re mfo ext exc period to file plan 19x .51= 9.69 | Billing Complete | \$9.69 | \$9.69 |
| 02/11/2021 | Northern Holdings, LLC | Non-Category Related | Rebeca Benitez | Mailing/Postage | st rpt 19x .51=9.69 | Billing Complete | \$9.69 | \$9.69 |
| 02/17/2021 | Northern Holdings, LLC | Non-Category Related | Rebeca Benitez | Mailing/Postage | 1) emp app hilco 2) ntc emp app 1x 2.30, 2x 1.80, 12x .51= 12.02 | Billing Complete | \$12.02 | \$12.02 |
| 02/24/2021 | Northern Holdings, LLC | Non-Category Related | Roksana D. Moradi-Brovja | Court Call | Court Call hearing on status conf | Billing Complete | \$26.25 | \$26.25 |
| 03/04/2021 | Northern Holdings, LLC | Non-Category Related | Rebeca Benitez | Mailing/Postage | ntc of hrng on emp app 13x .51= 6.63 | Billing Complete | \$6.63 | \$6.63 |
| 03/22/2021 | Northern Holdings, LLC | Non-Category Related | Roksana D. Moradi-Brovja | Court Call | court call for various hearings: cont'd MFR; emp cpa; st conf; ust mtn dism/conv; farm's mtn compel compliance; emp broker Hilco | Billing Complete | \$26.25 | \$26.25 |
| 06/08/2021 | Northern Holdings, LLC | Non-Category Related | Rebeca Benitez | Mailing/Postage | st rpt 1x 2, 24x .71= 19.04 | Billing Complete | \$19.04 | \$19.04 |
| 06/14/2021 | Northern Holdings, LLC | Non-Category Related | Roksana D. Moradi-Brovja | Court Call | court call for June 14, 2021 hearings re st conf; conf hrg; ust mtn dism; mfr | Billing Complete | \$26.25 | \$26.25 |
| Totals Billable Amounts for Northern Holdings, LLC | | | | | | | \$162.07 | \$162.07 |
| Grand Total | | | | | | | \$162.07 | \$162.07 |

EXHIBIT “D”

Resnik Hayes Moradi, LLP is a boutique law firm with offices in Encino and Los Angeles. The Firm has eight attorneys and seven paralegals. The Firm represents debtors and creditors in all divisions in the Central District of California, and clients in all state courts in California.

Resnik Hayes Moradi LLP's three partners, who have more than 75 years of experience between them, have practiced together since 2012. Each of the three partners is a Certified Bankruptcy Specialist, California Bar Association, Board of Legal Specialization. The five associate attorneys have more than 55 years of legal experience in a variety of areas of law.

The partners of the Firm have filed or overseen at least 4,000 consumer bankruptcy cases in the past 20 years. The Firm has filed at least 250 Chapter 11 cases in the past eight years and confirmed more than 100 of those cases.

Resnik Hayes Moradi LLP specializes in the following areas of law:

| | | |
|---|-----------------------------------|---|
| Individual Bankruptcy | Business and Corporate Bankruptcy | Bankruptcy Litigation - Creditor and Debtor |
| Civil Litigation in State and Federal Courts. | Loan Modifications | Appeals in State and Federal Courts |

Individual Bankruptcy includes:

- Chapter 7 liquidation
- Chapter 13 reorganization
- Chapter 11 reorganization for individuals
- Small Business chapter 11 cases under SBRA

Business and Corporate Bankruptcy includes:

- Chapter 11 reorganization
- Small Business chapter 11 cases under SBRA

Bankruptcy Litigation includes:

- Defending debtors in all types of litigation in bankruptcy court ("adversaries") including non-dischargeability actions, actions brought by trustees or the United States Trustee, motions for relief from stay and motions to dismiss.
- Evidentiary hearings, including but not limited to valuations of property and/or business related assets
- Representing creditors in many capacities including but not limited to non-dischargeability actions, objections to claims, motions for relief from stay and matters surrounding dismissal of a case.

Civil Litigation in State and Federal Courts:

- Business and Partnership disputes
- Wrongful foreclosure actions
- Unlawful Detainers, landlord and tenant representation
- Debt Collection and Assignment for the Benefit of Creditors

Loan Modification:

- Including modifying the term of the loan or a reduction in the loan principal balance or modification of the interest rate to more favorable terms.

Appeals:

- All California courts
- All Federal Courts in the Ninth Circuit.

Matthew D. Resnik, Partner

Certified Bankruptcy Specialist, State Bar of California, Board of Legal Specialization

Office number (818) 285-0100
matt@rhmfirm.com

Practice Areas:

- Bankruptcy - Individual and Business
- Bankruptcy Litigation
- Civil Litigation
- Loan Modification

Education:

California State University at San Diego (B.A., 1992)
University of West Los Angeles School of Law (J.D. 1996)

Matthew Resnik is the managing partner at Resnik Hayes Moradi LLP. He directs the operations of the Firm and meets with most potential new clients.

Mr. Resnik has extensive experience in all aspects of bankruptcy as well as state foreclosure laws and loan modification laws. He has dedicated his legal career of more than 23 years to

representing financially distressed individuals and businesses against their creditors. His reputation and excellent track record in consumer and business bankruptcy is widely recognized in Southern California.

Mr. Resnik has personally represented and overseen the bankruptcy cases of upwards of 4,000 businesses and individuals. He has also represented creditors, landlords and others in bankruptcy and voluntary workout proceedings. He is as familiar with the many details of the chapter 13 process as he is with complex business reorganizations. Matt oversees every aspect of the firm's extensive chapter 13 practice.

Mr. Resnik has also prosecuted and defended many complaints to declare debts non-dischargeable, to deny the discharge and other bankruptcy related litigation matters.

Mr. Resnik has also represented many homeowners in wrongful foreclosure actions in state court as well as federal court. He has extensive experience in civil litigation in real estate and other business litigation matters.

Mr. Resnik was nominated as a Super Lawyer in 2014, 2015, 2016, 2017, 2018, 2019 and 2020. He has been a panelist at numerous seminars especially relating to the Bankruptcy Abuse Prevention and Consumer Protection Act of 2005.

Mr. Resnik is a member of the Central District Consumer Bankruptcy Attorneys Association ("CDCBAA").

Mr. Resnik is married and has three children. He is very active in boys little league in Encino.

M. Jonathan Hayes, Partner

Certified Bankruptcy Specialist, State Bar of California, Board of Legal Specialization

Direct phone number (818) 933-2840
jhayes@rhmfirm.com

Practice Areas:

- Bankruptcy - Individual and Business
- Bankruptcy Litigation
- Appeals
- Mediations

Education:

Loyola University School of Law (J.D., 1977)
Loyola University (B.A., 1971)

Straus Institute for Dispute Resolution of the Pepperdine University School of Law, 30 hours
(Certificate received 1995)

M. Jonathan Hayes concentrates his practice in bankruptcy and corporate - business litigation. He has represented many Chapter 11 debtors, businesses and individuals, and effected many successful reorganization plans. Mr. Hayes' recent chapter 11 cases include representing an individual with \$40 million worth of real property largely located in downtown Los Angeles, a chain of 28 retail clothing stores, an architectural firm, a clothing manufacturer with 110 employees, a specialty vodka manufacturer, six adult health care facilities, a 66 room hotel in Laguna Beach, a small trucking company, a medical clinic, a company that owed two Baskin Robbins stores, a former major league baseball player with \$40 million in assets; a company which had 225 lawsuits pending against it on the date of filing being defended by the debtor's insurance company; a company which owned 20 oil wells; a company which owned a large hotel in Culver City which was sold during the case for \$25 million, a "dot com" company; a Condominium Homeowners Association fending off a \$9 million judgment creditor; a furniture manufacturing company (\$4 million annual sales); a chain of carpet stores (\$10 million annual sales); an employee leasing company (\$30 million in annual sales); a wireless entertainment equipment sales company; a litigation attorney; a sunglass wholesaling company; a bait tank and machine shop; and a small commercial center.

From 2012 through mid-2019, Mr. Hayes has filed or otherwise taken-over approximately 143 chapter 11 cases including 112 cases for individuals primarily trying to save their homes and other real property. In the past, he has represented three franchisees in the Econo-Lube bankruptcy filing adversary proceedings for each demanding more than \$10 million in total and settling each successfully. He represented the Creditor's Committee in the MiDici Pizza case, Lucy's LaundryMart and SBB Roofing chapter 11 cases. He was lead counsel for the Creditor's Committee in the Breath Asure, Inc. Chapter 11 and the B.C. Oil, Inc. Chapter 11.

Mr. Hayes has prosecuted and defended about twenty-five bankruptcy appeals to the Bankruptcy Appellate Panel, the district court, and the 9th Circuit Court of Appeals.

Mr. Hayes has prosecuted and defended complaints to declare debts non-dischargeable, to deny the discharge and other bankruptcy related litigation matters. He has defended several fraudulent conveyance actions brought by trustees in so-called Ponzi schemes. He has filed many Chapter 7 for clients and has handled many bankruptcies that are commenced because of tax problems of the debtors.

Mr. Hayes has been a member of the panel of mediators of the Bankruptcy Mediation Program for the Central District of California since the program's inception in 1995. He estimates that he has presided over at least 150 mediations in total.

In addition, Mr. Hayes

- is the past President, 2013 and 2014, and a member of the Board of Directors of the Central District Consumer Bankruptcy Attorneys Association ("cdcbaa").

- is the Director of the Bankruptcy Litigation Clinic at the University of West Los Angeles where law students from UWLA are used to help parties deal with litigation in bankruptcy court on a pro bono basis.
- is on the Board of Editors of the California Bankruptcy Journal since 2001.
- He was previously on the Board of Directors of the Los Angeles Bankruptcy Forum, 2013 to 2018.
- He was a Lawyer Representative to the Central District Judicial Conference, 2014 to 2020.
- He was previously a member of the California State Bar Board of Legal Specialization, Bankruptcy Law Advisory Commission (“BLAC”), 2010 to 2018. He was Vice-Chairman for the year 2016-2017 and Chairman for the year 2017-2018. The BLAC prepares and grades the bi-annual examination for candidates for legal specialization and chooses those who are entitled to be certified.

Recent publications:

- "Remember, landlords are sacred cows in bankruptcy," *Los Angeles Daily Journal*, May 20, 2021.
- "Small Business Chapter 11 update, where are we eight months in?" *Los Angeles Daily Journal*, October 26, 2020.
- "Congress, it's time to get rid of that stupid means test!" *Los Angeles Daily Journal*, April 30, 2020.
- "Thinking out loud about the new Small Business Chapter 11," *Los Angeles Daily Journal*, November 27, 2019.
- "Lawyers are People Too," for the Central District Consumer Bankruptcy Attorneys Assn Newsletter. Interviews with Paul Winkler, Dennis McGoldrick, Pat Green, Daniela Romero, Stella Havkin, Judge Maureen Tighe, Marcus Tiggs and Amy Goldman.

Recent Presentations:

- "Evidence in Bankruptcy Court," for the Central District Consumer Bankruptcy Attorneys Assn (“cdcbaa”), March 20, 2021 with Judge Barry Russell.
- "Discharge Violation Injunctions: *In re Marino* says the fine print doesn't save the creditor," Business Law Section of the California Lawyers Assn, November 17, 2020 with Leonard Gumport and Christopher Burke.
- "10 Things Every Lawyer Should Know About Bankruptcy in the Age of COVID-19," Solo and Small Firms Section of the California Lawyers Association, October 8, 2020 with Cathy Ta, Mike O'Halloran and Gary Rudolph
- "Fallout of Taggart's Test," July 9, 2020, National Association of Chapter 13 Trustees (NACTT) annual meeting with Christopher Hawkins, Atlanta, GA and Keith Rucinski, Chapter 13 Standing Trustee for the Northern District of Ohio
- "Day One: Retainers, Trust Accounts and Getting Started on the Right Foot," November 22, 2019, Federal Bar Assn of Los Angeles with John Sheller and Arthur Margolis
- "Chapter 7, Chapter 13 and the Stay - Oh My! Do Not Fear - the Bankruptcy Experts Are Here," March 22, 2019, 2019 Annual Association of Family Law Specialists Spring Seminar, with Judge Victoria Kaufman, Jeff Golden and Susan Luong

- “Recent Supreme Court Cases of Interest to Bankruptcy Practitioners,” December 14, 2018, for the San Fernando Valley Bar Assn with Judge Alan Ahart (Ret.).
- Moderator of “5th Annual Consumer Bankruptcy Review” with five bankruptcy judges for Orange County Bar Assn, Commercial Law and Bankruptcy Section, October 23, 2018 at Chapman University, Fowler School of Law
- “Equal Access to Justice,” for the Ninth Circuit Judicial Conference in Anaheim, CA, July 25, 2018 with Scott Bovitz and Michael O’Halloran
- “Automatic Stay and Discharge Injunctions Violations,” for the Central District Consumer Bankruptcy Attorneys Assn (“cdcbaa”), June 9, 2018 with Raymond H. Aver and Christopher Burke.
- “Hiding in the Valley or Shouting from the Mountain – Debtor’s Schedules and Full Disclosure,” May 19, 2018, California Bankruptcy Forum Insolvency Conference with Ed Hays, Jenny Doling, and Hagop Bedoyan.
- The Sixth Annual James T. King Bankruptcy Symposium; “In re Taggart: the Supreme Court and Discharge Violations,” for the Central District Consumer Bankruptcy Attorneys Assn (“cdcbaa”), September 7, 2019 with Daniel Geyser and Prof. Daniel Bussel, University of California Los Angeles School of Law.
- The Seventh Annual James T. King Bankruptcy Symposium; “Claim and Issue Preculsion: A Primer,” for the Central District Consumer Bankruptcy Attorneys Assn (“cdcbaa”), September 12, 2020 with Judge Laura Taylor, Southern District of California and Judge Meredith Jury (Ret).
- “A Review of 9th Circuit Published Decisions on Bankruptcy” for the Central District Consumer Bankruptcy Attorneys Assn (“cdcbaa”)
 - on January 27, 2018 with Judge Julia Brand and Judge Charles Novack, Northern District of California.
 - On January 12, 2019 with Judge Neil Bason and Judge Christopher Klein, Eastern District of California.
 - On January 18, 2020 with Judge Julia Brand and Judge Christopher Klein, Eastern District of California.
 - On January 23, 2021 with Judge Neil Bason and Judge William Lafferty, Northern District of California.

On November 3, 2016, Mr. Hayes received the Hon. Thomas B. Donovan Excellence Award from the Central District Consumer Bankruptcy Attorneys Assn (“cdcbaa”). The award is given for “excellence in writing or advocacy, service to the court or service to the bar.” The award was presented to him at the annual Calvin Ashland Awards Dinner of the cdcbaa.

On June 21, 2012 and again on October 25, 2018, Mr. Hayes received the Hon. William J. Lazarow Award from Public Counsel and the Debtor Assistance Project for Outstanding Pro Bono Service to the Community.

In 2013, Mr. Hayes sat on the 9th Circuit Merit Selection Committee responsible for choosing candidates for the open judgeship position in the Riverside Division of the Central District of California. In 2014, Mr. Hayes sat on the 9th Circuit Merit Selection Committee responsible for choosing candidates for the open judgeship position in the Woodland Hills Division of the

Central District of California.

Mr. Hayes has been an Adjunct Professor of Law at the University of West Los Angeles (previously University of LaVerne School of Law) for the past 30 years where he has taught Bankruptcy, Business Organizations, Contracts, Advanced Bankruptcy Issues, Commercial Law, and Taxation. Before that he was on the adjunct faculty of Whittier School of Law for four years. He maintains a blog directed primarily for his students at www.profhayesuwla.com.

Mr. Hayes is the author of three books entitled, “*A Summary of Bankruptcy Law*, Third Edition” published in December, 2016; “*Bankruptcy Jurisprudence from the Supreme Court*, Second Edition” published in 2016; and “*Melvyn ‘Deacon’ Jones: My 40 years with the Blues Legends*,” published in 2004. All are available on Amazon.com.

Mr. Hayes previously wrote a monthly column, “Judicial Profiles” for the San Fernando Valley Bar Association magazine, “Bar Notes,” on judges in the San Fernando Valley. He maintains a blog at www.centraldistrictinsider.com. He was a regular contributor to the Supreme Court Corner at www.considerchapter13.org.

Mr. Hayes is married and has four children. He has lived in Northridge for 36 years.

Roksana D. Moradi-Brovia | Partner

Certified Bankruptcy Specialist, State Bar of California, Board of Legal Specialization

Direct phone number: (818) 933-2843

Email: roksana@rhmfir.com

Practice Areas:

- Bankruptcy - Individual and Business
- Bankruptcy Litigation

Education:

University of West Los Angeles – School of Law (J.D. 2009)

Roksana D. Moradi-Brovia has dedicated her legal career to representation of both individuals and businesses navigating through Chapter 7 and Chapter 11, and litigation arising in the bankruptcy context.

She has successfully confirmed 85 Chapter 11 Plans of Reorganization for both individuals and businesses, assisting her clients through the “rehabilitation” process at each step of the way. Recent Chapter 11 cases include representing a couple with 19 income producing real properties, a small trucking company, a jewelry store, a dental practice, a tortilla manufacturing business and

an LLC which owns a 13-unit commercial building. She routinely represents patient care ombudsmans appointed in healthcare bankruptcy cases.

Ms. Moradi-Brovia was nominated as a Super Lawyers Rising Star in 2014, 2015, 2016, 2017, 2018, 2019 and 2020.

She was the 2018 and 2019 *President* of the Central District Consumer Bankruptcy Attorneys Association (“cdcbaa”) and has been on the *Board of Directors* and the *Programs Chair* of the *cdcbaa* since 2013.

In May of 2019, Ms. Moradi-Brovia was elected to serve as an honorary member on the *Board of Directors* of the Los Angeles Bankruptcy Forum (“LABF”). In May of 2021, she was selected to join the LABF’s Diversity, Equity & Inclusion Committee.

In July of 2019, Ms. Moradi-Brovia was elected to the *Board of Directors* of the James T. King Southern California Bankruptcy Inn of Court (“Inn”). In May of 2021, she was elected as the *Vice President* of the Inn for year 2021-2022.

Ms. Moradi-Brovia was the 2018-2019 *Chair* of the Commercial Law and Bankruptcy Section of the Los Angeles County Bar Association (“LACBA”), previously holding the positions of *Programs Chair, Secretary and Vice Chair*; she remains an active participant in the Section. She acted as *Chair* of the Debtor Assistance Project/*Pro Bono* Sub-Committee of the Bankruptcy/Commercial Law Section of LACBA from 2013 through 2017. Ms. Moradi-Brovia was the LACBA representative for the U.S. Bankruptcy Court for the Central District of California’s Bar Advisory Board for 2017.

In December of 2019, Ms. Moradi-Brovia was selected by Chief Judge of the U.S. Bankruptcy Court for the Central District of California, Hon. Maureen A. Tighe, to the Court’s *Small Business Reorganization Task Force* whose mission is to work to identify obstacles in the current system for small businesses in distress, perform outreach and education issues in the community and suggest edits to the Court’s Local Rules as related to the new Small Business Reorganization Act.

In 2014, Ms. Moradi-Brovia was selected by the U.S. Bankruptcy Court for the Central District of California’s Bar Rules Advisory Group as the *Working Group Chair* of the “Disclosure Statement in Support of Chapter 11 Plan of Reorganization,” “Cash Collateral Motion,” and “Budget Motion” committees working to revise the current versions of those Chapter 11 Individual Debtor forms.

Recent Presentations:

- “Bankruptcy Basics for the Non-Bankruptcy Practitioner” MCLE program for the LA Law Library on January 20, 2021, with Jeremy H. Rothstein.
- “Brace Yourself! The Shockwave Caused by the California Supreme Court’s Decision in *Brace*, the Extent of its Impact on Bankruptcy Cases; Other Community Property Issues;

and an Update on Recent Homestead Cases; Discussion of AB 1885/SB 832 Which Increased the California Homestead Exemption to as High as \$600,000” MCLE program for the Inland Empire Bankruptcy Forum on September 10, 2020, with Chief Judge Margaret M. Mann, D. Edward Hays and moderated by Chapter 7 Trustee, Richard Marshak.

- “Business Bankruptcy 101: Chapter 11 Nuts and Bolts” MCLE program for Pincus Professional Education on July 21 and 23, 2020, with Steven R. Fox, Stella Havkin, David Samole, Jeffrey Best and Allison Day.
- “The Small Business Reorganization Act of 2019 - Subchapter V of Chapter 11” MCLE program for the National Association of Consumer Bankruptcy Attorneys on May 21, 2020, with Subchapter V Trustee Richard Cook, Dan Press and Brett Weiss.
- “Recent, Relevant and Riveting Ninth Circuit Bankruptcy Appellate Panel Cases” MCLE program for the San Fernando Valley Bar Association on October 11, 2019, with the Hon. Deborah J. Saltzman and Jessica Bagdanov.
- “Individual Chapter 11s: An Overview” MCLE program from the Orange County Bar Assoc. – Commercial Law and Bankruptcy Section on May 23, 2019, with the Hon. Neil W. Bason, Steven Fox, Stella Havkin, Peter Lively, Dennis McGoldrick and moderated by Ed Hays.
- “Key Consumer Cases from Around the Country” MCLE program for the San Fernando Valley Bar Association on March 22, 2018, with the Hon. Sandra R. Klein and Cassandra J. Richey.
- “Interesting, Important and All Consuming Opinions of Central District Bankruptcy Judges” MCLE program for the San Fernando Valley Bar Association on January 19, 2018, with the Hon. Victoria S. Kaufman and James Selth.
- “Consumer Potpourri” MCLE program for the San Fernando Valley Bar Association on May 12, 2017, with Dennis McGoldrick and Nina Javan.
- “Chapter 11: Essentials and Special Situations” MCLE program for Pincus Professional Education on November 4, 2016, with the Hon. Neil W. Bason, Steven R. Fox, Stella Havkin, Peter Lively, and Dennis McGoldrick.
- “9th Circuit Bankruptcy Appellate Panel Review” MCLE program for the San Fernando Valley Bar Association on October 28, 2016, with Katherine C. Bunker and Raymond H. Aver.
- “Elimination of Bias” MCLE program for the *cdcbaa* at Southwestern Law School on February 27, 2016, with Nancy B. Clark and Magdalena Reyes Bordeaux.
- “When is Conversion Kosher? Exploring the Hows, Whens, and Whys of Converting Cases from One Chapter to Another” MCLE program for the Central District Consumer Bankruptcy Attorneys Association (“cdcbaa”) at Southwestern Law School on February 8, 2014, with the Hon. Catherine Bauer and Jeffrey Hagen.
- “An Introduction to Adversary Proceedings” MCLE program for Public Counsel at the U.S. Bankruptcy Court – Los Angeles Division on July 11, 2013, with the Hon. Sandra R. Klein, and attorneys Magdalena R. Bordeaux and Roye Zur.

Publication: “The Section 1111(b) Election: A Primer,” *California Bankruptcy Journal*, December 2011 (with M. Jonathan Hayes).

Ms. Moradi-Brovia volunteers regularly at Neighborhood Legal Services' Bankruptcy Self Help Desk and Public Counsel's Bankruptcy Self Help Desk and Reaffirmation Clinics. She also volunteers regularly at local high schools with Credit Abuse Resistance Education ("CARE") - a national, nonprofit organization providing students and young adults with the skills they need to make smart financial decisions.

On September 10, 2014, Ms. Moradi received the Public Counsel Debtor Assistance Project *Pro Bono* award.

Ms. Moradi-Brovia received her Juris Doctorate from the University of West Los Angeles – School of Law in June of 2009 and was admitted to the State Bar of California and the United States District Court in December of 2009. She was admitted to the Ninth Circuit Court of Appeals in 2013. While in law school, Ms. Moradi-Brovia had the privilege of externing for the Hon. Tracy Grant in San Pedro. Ms. Moradi-Brovia was the Dean of the Delta Theta Phi Law Fraternity her last year of law school.

Ms. Moradi-Brovia immigrated to the United States when she was a child and is fluent in Polish. She is married and lives in Santa Monica.

Russell Stong
Associate Attorney, Los Angeles Office

Certified Bankruptcy Specialist, State Bar of California, Board of Legal Specialization

Office phone number: (213) 572-0800
russ@rhmfirm.com

Practice Areas:

- Bankruptcy - Individual and Business
- Bankruptcy Litigation

Education:

University of Southern California B.S. Business 1983
University of California Los Angeles Real Estate program 1986 to 1987
University of West Los Angeles School of Law 1994

Real Estate Brokers License 3/19/1988 to present
Real Estate License 1985 -1988

Member of the Central District Consumer Bankruptcy Attorneys Association ("CDCBAA")

Mr. Stong appears in bankruptcy court several times a week and has done so for the past 25 years. He is especially adept in the chapter 13 and chapter 7 arenas where he helps individuals protect their homes, cars and other assets. Russ is a highly respected advocate in court and enjoys using his quick oral advocacy skills in front of the Judges. Russ is passionate about his client's rights, but commands the respect from his adversaries due to his outgoing personality and pleasant disposition.

Prior to working for Resnik Hayes Moradi LLP Russ represented financial institutions in fraud actions as a creditor's attorney. This experience gives him insight into handling individual debtor cases as he understands the mentality and approach of the creditor attorney. Additionally, Russ developed a strong working relationship with other creditor attorneys, which helps ameliorate complex issues and provide alternatives for his clients. This experience also allowed Russ to argue matters in front of all the Central District Bankruptcy Judges, which enables him to know the patterns and practice of each Bankruptcy Judge.

Prior to becoming an attorney Russ practiced commercial real estate leasing/sales/marketing services including search analysis and lease negotiation. Representing both Landlord and Tenant interests from site location to final occupancy.

David M. Kritzer
Associate Attorney, Encino Office

Office phone number: (818) 285-0100
david@rhmfirm.com

Practice Areas:

- Bankruptcy Litigation
- Civil Litigation - all Federal and State Courts

Education:

Pepperdine University School of Law (J.D. 1993)
1992 - 1993 Moot Court Board - Co-Chair of 1993 Dalsimer Competition
1991 London Program Participant - Moot Court vs. London University

University of California, San Diego, Marshall (Third) College
Bachelor of Arts - Political Science - June 1990
Student Advocate Board, Associated Students - 1985 - 1987

David M. Kritzer is the primary state court litigator at Resnik Hayes Moradi LLP with over 26 years experience in and out of the courtroom. He is very active in all of the firm's litigation matters, regularly appearing in state and federal courts. He has extensive experience in general business litigation, unlawful detainers, real estate litigation, general commercial and business

financial litigation, debtor-creditor litigation, and judgment enforcement with significant discovery, law and motion and trial practice experience.

Mr. Kritzer is married and has three children. He is very active in the Boy Scouts of America.

W. Sloan Youkstetter
Associate Attorney, Encino and Los Angeles Offices

Office phone number: (213) 572-0800
sloan@rhmfirm.com

Practice Areas:

- Bankruptcy - Individual and Business
- Bankruptcy Litigation

Education:

Southwestern Law School; Los Angeles, California - J.D. May 2011
University of San Diego; San Diego, California - Bachelor of Arts, Political Science, May 2007

Mr. Youkstetter joined Resnik Hayes Moradi LLP in 2020 after six years of experience with boutique bankruptcy firms in Southern California. Sloan brings considerable experience to the Firm especially in the areas of chapter 7, 11 and 13.

Mr. Youkstetter was nominated as a Super Lawyers Rising Star in 2017, 2018, 2019 and 2020.

In November 2015, Mr. Youkstetter received the Public Counsel Debtor Assistance Project *Pro Bono* award. He received the United States Bankruptcy Court - Central District of California's Certificate of Appreciation in 2014, 2015, 2016, 2017, 2018, 2019, and 2020 for his pro bono service.

Mr. Youkstetter is a member of the Central District Consumer Bankruptcy Attorneys Association and the James T. King Bankruptcy American Inn of Court.

In his last year of law school, Mr. Youkstetter externed with the County of Los Angeles District Attorney's Office in the Target Crimes Division (Crimes Against Peace Officers Unit and the Preliminary Hearings Unit). He was a Certified Law Student that allowed him to conduct preliminary hearings in criminal court.

In the summer of 2005, Mr. Youkstetter interned for U.S. Representative Adam Schiff, 29th Congressional District.

Recent Presentations:

“The SFVBA Presents Tentative Opinions of the Woodland Hills Bankruptcy Court” MCLE program for the San Fernando Valley Bar Association on October 9, 2020, with Robert M. Aronson and Nicholas Gebelt.

Pardis Akhavan
Associate Attorney, Encino Office

Office phone number: (818) 285-0101
pardis@rhmfir.com

Practice Areas:

- Bankruptcy chapter 7 and chapter 13

Education: University of West Los Angeles School of Law (J.D. 2017) Magna Cum Laude

Ms. Akhavan immigrated to the United States from Iran eight years ago. She graduated from college in Iran and spent eight years working in the banking industry before coming to the United States. Her first job here was as Administrative Manager of an insurance agency. From there, she worked for Wells Fargo Bank as a teller and was soon promoted to a personal banker. She stayed with Wells Fargo Bank for three years until she decided to go to law school. She graduated from UWLA School of Law in 2016 and passed the California Bar Exam on her first try.

Ms. Akhavan joined Resnik Hayes Moradi, LLP straight from law school in 2017. She has quickly learned the technical and practical rules of the chapter 13 and chapter 7 practices. She has already appeared in at least 100 chapter 13 confirmation hearings and more than 50 creditor's meetings in both chapter 13 and chapter 7.

Languages spoken: Farsi

Boshra Khoder
Associate Attorney, Encino Office

Office phone number: 818-330-4391
boshra@rhmfir.com

Practice Areas:

- Bankruptcy chapter 11

Education: University of West Los Angeles- School of Law (J.D. 2021) Cum Laude
Lebanese University- Beirut, Lebanon (B.A in Political Science 2010)

Ms. Khoder immigrated to the United States seven years ago. She graduated from college in Lebanon and worked for more than 3 years in journalism before she came to the United States. After coming here, she studied for two years at Pierce College, where she studied English and other subjects since she was French educated when she was in Lebanon. Her first job in the United States was English as Second Language tutor in Pierce College, where she was on the Dean's List. After completing 60 transferable units at the college, she decided to go to law school. She graduated from UWLA School of Law in December 2020 and passed the California Bar Exam on her first try.

Ms. Khoder joined Resnik Hayes Moradi, LLP right after passing the Bar.

Languages Spoken: Arabic

Rozario Zubia
Paralegal, Encino Office

Office phone number: (818) 285-0100
rosario@rhmfirm.com

Education: California State University Northridge, 1980s

Rosario was a bankruptcy paralegal for a bankruptcy specialist sole practitioner in Los Angeles from 1994 to 2004. Rosario began as a paralegal for M. Jonathan Hayes in 2009. She is also a licensed real estate agent in the State of California. Rosario works closely with Mr. Hayes and Ms. Moradi-Brovia in the chapter 11 department. She has significant experience with compliance required by the US Trustee's Office and with chapter 11 bankruptcy schedules.

Languages spoken: Spanish.

Ja'Nita Fisher
Paralegal

Office phone number: (818) 285-0100
janita@rhmfirm.com

Education: California State University Northridge, 2017 B.S. Business Management

Ja'Nita Fisher has been a paralegal with M. Jonathan Hayes since January 2012.

Susie Segura

Paralegal and Office Manager, Los Angeles Office

Office phone number: (213) 572-0800
susie@rhmfirm.com

Susie has been a bankruptcy paralegal since 1999. She worked for the Law Office of Claudia Phillips before she was hired by Matt Resnik in 2004. She is very experienced in all aspects of consumer Chapter 7 and Chapter 13 cases.

Languages spoken: Spanish.

Max Bonilla

Paralegal, Los Angeles Office

Office phone number: (213) 572-0800
max@rhmfirm.com

Education: Mt. San Antonio College (A.A. 2006)

Max was a paralegal with a personal injury firm for 4 years. In 2009, he joined Simon & Resnik, LLP which later became Resnik Hayes Moradi, LLP in 2018. He is especially knowledgeable with all aspects of Chapter 7 and Chapter 13.

Languages Spoken: Spanish

Priscilla Bueno

Paralegal, Encino Office

Office phone number: (818) 285-0100
priscilla@rhmfirm.com

Education: Mission College (A.A. 2011) studying for a paralegal certificate

Priscilla was a paralegal for a worker's comp and personal attorney for about five years. Then she worked for Bank of America in the trust department and later in the bankruptcy department. With Bank of America, she was involved with bankruptcy sales for Recontrust. She joined Resnik Hayes Moradi LLP in April, 2017. Priscilla is active in the firm's chapter 13 department.

Languages spoken: Spanish.

Rebeca Benitez
Paralegal, Encino Office

Office phone number: (818) 285-0100
rebeca@rhmfir.com

Education: University of Phoenix, B.S. in Criminal Justice, 2009
Los Angeles Mission College, 2001-2003

Beca has been a bankruptcy and litigation paralegal since 2005. She has extensive experience preparing bankruptcy petitions for all chapters, assisting attorneys with all motions typically found in consumer bankruptcy cases. She also has extensive experience assisting attorneys with unlawful detainer litigation and general civil litigation in state and federal courts in the Los Angeles area. Beca is active in the firm's litigation department. She works hand in hand with Matt Resnik and David Kritzer and is also active with our consumer debtor clients.

Languages spoken: Spanish.

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www.CentralDistrictInsider.com

PROOF OF SERVICE OF DOCUMENT

I am over the age of 18 and not a party to this bankruptcy case or adversary proceeding. My business address is:

510 West Sixth Street, Suite 1220, Los Angeles, CA 90014.

A true and correct copy of the foregoing document entitled (*specify*): FINAL APPLICATION BY RESNIK HAYES MORADI LLP, GENERAL BANKRUPTCY COUNSEL FOR THE DEBTOR, FOR ALLOWANCE OF FEES AND REIMBURSEMENT OF COSTS FOR THE PERIOD FEBRUARY 5, 2021 THROUGH JUNE 15, 2021 will be served or was served **(a)** on the judge in chambers in the form and manner required by LBR 5005-2(d); and **(b)** in the manner stated below:

1. TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING (NEF): Pursuant to controlling General Orders and LBR, the foregoing document will be served by the court via NEF and hyperlink to the document. On (*date*) 9/29/2021, I checked the CM/ECF docket for this bankruptcy case or adversary proceeding and determined that the following persons are on the Electronic Mail Notice List to receive NEF transmission at the email addresses stated below:

☒ Service information continued on attached page

2. SERVED BY UNITED STATES MAIL: On (*date*) 9/29/2021, I served the following persons and/or entities at the last known addresses in this bankruptcy case or adversary proceeding by placing a true and correct copy thereof in a sealed envelope in the United States mail, first class, postage prepaid, and addressed as follows. Listing the judge here constitutes a declaration that mailing to the judge will be completed no later than 24 hours after the document is filed.

☒ Service information continued on attached page

3. SERVED BY PERSONAL DELIVERY, OVERNIGHT MAIL, FACSIMILE TRANSMISSION OR EMAIL (*state method for each person or entity served*): Pursuant to F.R.Civ.P. 5 and/or controlling LBR, on (*date*) 9/29/2021, I served the following persons and/or entities by personal delivery, overnight mail service, or (for those who consented in writing to such service method), by facsimile transmission and/or email as follows. Listing the judge here constitutes a declaration that personal delivery on, or overnight mail to, the judge will be completed no later than 24 hours after the document is filed.

☐ Service information continued on attached page

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

9/29/2021
Date

W. Sloan Youkstetter
Printed Name

/s/ W. Sloan Youkstetter
Signature

1. TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING (NEF) [CONTINUED]:

- William H Brownstein Brownsteinlaw.bill@gmail.com
- Nancy S Goldenberg nancy.goldenberg@usdoj.gov
- Michael J Gomez mgomez@frandzel.com, dmoore@frandzel.com
- D Edward Hays ehays@marshackhays.com,
ehays@ecf.courtdrive.com;kfrederick@ecf.courtdrive.com;cmendoza@marshackhays.com;cmendoza@ecf.courtdrive.com
- Kari L Ley Ley1238@att.net
- Tinho Mang tmang@marshackhays.com,
tmang@ecf.courtdrive.com;kfrederick@ecf.courtdrive.com;cmendoza@ecf.courtdrive.com
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- United States Trustee (SA) ustpregion16.sa.ecf@usdoj.gov
- Reed S Waddell rwaddell@frandzel.com, sking@frandzel.com
- Gerrick Warrington gwarrington@frandzel.com, sking@frandzel.com
- David Wood dwood@marshackhays.com,
dwood@ecf.courtdrive.com;lbuchananmh@ecf.courtdrive.com;kfrederick@ecf.courtdrive.com
-

2. SERVED BY UNITED STATES MAIL [CONTINUED]:

Hon. Mark S. Wallace
U.S. Bankruptcy Court
Central District – S.A. Division
411 West Fourth Street, Suite 6135
Santa Ana, CA 92701-4593

Northern Holding, LLC
13217 Jamboree Rd #429
Tustin CA 92782